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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William Caton
Acting Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CC Docket No. 02-35: Application by BellSouth for Authorization to
Provide In-Region InterLATA Services in Georgia and Louisiana

Dear Mr. Caton:

Attached are WorldCom's Reply Comments and Declaration in the above proceeding.

Please call me with any questions.

Sincerely,

Keith L. Seat
Senior Counsel
Federal Advocacy

No. of Originals 075
List of Enclosures

Attachments

cc: Renée Crittendon
Susan Pié

Before the
Federal Communications Commission
Washington, D.C. 20554

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MAR 29 2002

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Application by BellSouth)

for Authorization to Provide In-Region,)

InterLATA Services in Georgia and Louisiana)

CC Docket No. 02-35

**REPLY COMMENTS OF WORLDCOM, INC. ON THE APPLICATION
BY BELL SOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN GEORGIA AND LOUISIANA**

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March 28, 2002

INTRODUCTION AND EXECUTIVE SUMMARY

BellSouth has made no significant improvements in the weeks since WorldCom filed its initial comments in response to BellSouth's renewed joint section 271 application for Georgia and Louisiana. BellSouth has not agreed to vital revisions in its change management process. Nor has its operational support systems ("OSS") performance improved. To the contrary, new evidence confirms the critical nature of deficiencies WorldCom previously pointed out.

Although the Department of Justice now expresses tepid support for BellSouth's application, conditioned on this Commission's review of concerns expressed in its Evaluation, it points to few changes to address the issues that led to withdrawal of BellSouth's prior application. While DOJ is correct that BellSouth's OSS has improved slightly from the dismal state that existed when it initially applied for section 271 authority last Fall, the question is whether BellSouth now offers adequate, nondiscriminatory OSS. It does not. Most of the core concerns that led to withdrawal of BellSouth's prior application – a defective change management process, continued problems with its due date calculator, service order accuracy issues and unreliable performance data have not yet been corrected. Other significant OSS issues, such as incomplete line loss reports, exist as well.

Moreover, no party has provided further evidence that the OSS in Louisiana is identical to that in Georgia. As WorldCom previously explained, there are significant reasons to think the OSS is different. Commercial experience in Louisiana remains too limited to show the readiness of OSS there; as DOJ noted, "entry via the UNE-platform in Louisiana is still minimal." DOJ Eval. at 7.

Unfortunately, BellSouth still needs to resolve a significant number of existing systems issues before section 271 authority would be appropriate for the important “anchor” state in the BellSouth region. Moreover, BellSouth needs to begin working much more effectively with CLECs to resolve new OSS issues as they arise. In addition, BellSouth must resolve problems with its UNE rates, which still are not cost-based. These rates do not permit broad-based residential entry in Louisiana, and limit WorldCom’s competitive efforts to a single zone in Georgia. But BellSouth’s delay in providing its cost models in a form usable for analysis may necessitate a subsequent submission by WorldCom on pricing issues.

WorldCom continues to try to work with BellSouth to resolve the practical systems issues, but is finding it unreasonably difficult. The Commission should continue to send BellSouth a strong message that it must work to fix its systems and cooperate with CLECs before gaining interLATA entry. Thus, the Commission should deny the current application and encourage BellSouth to resolve its problems, and ensure that the fixes actually work through commercial experience or valid third-party testing, before again seeking section 271 authorization.

TABLE OF CONTENTS

| | |
|---|----|
| INTRODUCTION AND EXECUTIVE SUMMARY | i |
| TABLE OF APPENDICES | v |
| TABLE OF CITATION FORMS | v |
| NO PROGRESS HAS BEEN MADE ON CHANGE MANAGEMENT | 2 |
| BELLSOUTH HAS NOT FIXED PROBLEMS WITH ITS DUE DATE CALCULATOR | 5 |
| BELLSOUTH FAILS TO PROCESS ORDERS ACCURATELY | 7 |
| MIS-ROUTING OF INTRALATA CALLS | 7 |
| DELAYED UPDATING OF CSRS. | 8 |
| LOSS OF DIAL TONE | 9 |
| BELLSOUTH MANUALLY PROCESSES TOO MANY ORDERS | 11 |
| BELLSOUTH FAILS TO PROVIDE COMPLETE LINE LOSS REPORTS | 13 |
| CONCLUSION | 14 |

TABLE OF APPENDICES

| Tab | Declarant | Subject |
|-----|---|----------------------------|
| A | Reply Declaration of Sherry Lichtenberg | Operations Support Systems |

TABLE OF CITATION FORMS

| | |
|--------------------------------|---|
| Declarations | |
| <u>Reply Decl. Lichtenberg</u> | Reply Declaration of Sherry Lichtenberg on Behalf of WorldCom (Tab A hereto). |
| DOJ Evaluations | |
| <u>DOJ Eval.</u> | Evaluation of the Department of Justice, <u>In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</u> , CC Docket No. 02-35 (filed March 21, 2002). |
| Filings | |
| Ga. PSC Comments | Comments Georgia Public Service Commission, <u>In re Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Georgia and Louisiana</u> , CC Docket No. 02-35 (filed March 4, 2002). |

Before the
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**REPLY COMMENTS OF WORLDCOM, INC. ON THE APPLICATION
BY BELL SOUTH FOR AUTHORIZATION TO PROVIDE IN-REGION,
INTERLATA SERVICES IN GEORGIA AND LOUISIANA**

BellSouth's OSS continues to suffer from serious problems that must be resolved before BellSouth may properly receive in-region interLATA relief for an "anchor" state to which other BellSouth states can be compared. The primary change in the few weeks since WorldCom's initial Comments has been BellSouth's implementation of the Single C order on March 23, 2002. It will take some time to determine the extent of any problems with this release, although BellSouth has already reported one anomaly. The other fundamental problems WorldCom has reported with BellSouth's OSS have not been resolved.

Almost all of the parties that commented on BellSouth's application continue to find deficiencies with it. Commenters Network Telephone, Birch, AT&T, Xspedius, Allegiance, Comptel, US LEC, XO Georgia, KMC Telecom, and Mpower all continue to report significant problems with BellSouth's OSS. Moreover, KPMG continues to open observations and exceptions in its Florida testing that support WorldCom's conclusion that BellSouth's OSS is not yet ready. BellSouth has neither resolved the specific systems issues that currently exist nor fixed its change management process. This means that BellSouth is unlikely to be able to resolve future problems as they arise – even if it eventually resolves specific systems issues that

currently exist.

A. No Progress Has Been Made on Change Management

The importance of an effective change management process cannot be overstated. Change management underlies all other OSS issues, as it ensures that necessary changes are made to eliminate defects in existing OSS, to adapt to the ever-changing needs of the telecommunications market, and to implement changes without causing significant disruption for CLECs. To date, BellSouth's process has failed to serve any of these purposes. BellSouth also has not ensured its future performance will improve.

With one exception, BellSouth has not yet agreed to the substantial alterations in its change management process necessary to ensure implementation of important change requests prioritized by CLECs or to ensure smooth implementation of those changes that are implemented. In WorldCom's initial comments, we discussed the essential modifications to BellSouth's process that could begin to address these problems. In a meeting today, BellSouth finally agreed to the definition of "CLEC affecting change" proposed by CLECs. This is real progress. But that modification alone will not eliminate the problems that have become apparent in BellSouth's existing process, as WorldCom explained in its initial comments. BellSouth has not yet agreed to any of the other vital modifications proposed by CLECs – nor proposed effective alternatives to these modifications. Lichtenberg Reply Decl. ¶¶ 44, 46.

Nor can BellSouth rely on a proven track record of effectively implemented changes. BellSouth has not demonstrated empirically that it will now respond effectively to CLEC requests for changes. BellSouth also has not shown that it is capable of smoothly implementing

those changes it does implement. As DOJ observes “in implementing [recent] changes to its OSS BellSouth appears to have violated important change management principles.” DOJ Eval. at 7.

Indeed, KPMG continues to open observations and exceptions in Florida showing that BellSouth’s existing process is severely deficient, adding to the list of observations and exceptions KPMG has opened with respect to change management. On February 22, 2002, KPMG opened Exception 155 because BellSouth “fails to provide the Business rules and user requirements for Minor releases in accordance with the intervals defined in the Change Control Process.” KPMG provided numerous examples of this failure, supporting the conclusion of WorldCom and other CLECs on this score. KPMG also opened Exception 157 on March 4, 2002 because “BellSouth fails to follow its software testing and quality processes,” resulting in the release of defective interfaces into production. Thus, just as WorldCom posited, and contrary to BellSouth’s assertion, it is clear that BellSouth’s releases contain far more defects than a typical software release.

Moreover, once problems develop either as a result of a defective release or for some other reason, BellSouth generally provides very little assistance to CLECs in correcting these problems. After BellSouth withdrew its prior application, BellSouth improved its responsiveness with respect to some particular WorldCom issues but remained relatively unresponsive on others. Lichtenberg Reply Decl. ¶¶ 54-56. KPMG recently opened new observations in Florida regarding the failure of BellSouth’s account team to respond effectively to CLEC inquiries, supplementing an earlier observation to similar effect. *See* Observation 170 (deficiencies in External Response Team sub-process); Observation 165 (Account Team/CLEC Care Team

documentation is unclear); Observation 115 (account team does not respond in timely fashion).

The Georgia Commission states that BellSouth's performance is adequate. With respect to BellSouth's failure to implement many prioritized changes, the Georgia Commission notes that BellSouth has now committed to implementing in 2002 the CLECs' top 15 change requests. But as WorldCom has explained previously, this is a paltry number, especially given that BellSouth withdrew the planned implementation of the industry standard Local Service Ordering Guide ("LSOG") 5 release in order to make this commitment. Other ILECs are able both to implement industry standard changes and to implement a significant number of prioritized changes. Moreover, BellSouth's short term promise at most would facilitate essential changes this year; it would not alter BellSouth's ongoing practice to ensure that necessary changes continue to be implemented thereafter. Nor does BellSouth's 40% proposal address this problem – as we have said before. Despite the Georgia Commission's nominal praise of the 40% proposal, there is still an open docket indicating that the Commission believes the issue may need further work.

The Department of Justice notes the "positive steps taken in the area of change management" but acknowledges that important issues remain to be resolved. DOJ Eval. at 17-18. But the modifications made to date, while helpful, do not resolve the core issues with the process. For example, DOJ itself found that recent changes were implemented "without adequate testing and with defects." DOJ Eval. at 10. DOJ does not explain how any of the steps already taken will address that problem or will ensure that BellSouth implements sufficient changes. More is needed to show BellSouth's change management process is now ready than ongoing negotiation over the change management process. BellSouth, for example, must at a

minimum agree to include billing in change management, eliminate the back-room process in which it re-prioritizes changes without CLEC input, make IT personnel a more integral part of the process, agree to a plan ensuring implementation of prioritized changes in a fixed period of time, take steps to improve its internal testing of releases to avoid introduction of releases with substantial defects, and ensure that defects are corrected more quickly. Lichtenberg Decl. ¶¶ 119-23, 133, 147-50; Lichtenberg Reply Decl. ¶ 46. It has not addressed any of these problems to date.¹

B. BellSouth Has Not Fixed Problems With Its Due Date Calculator

WorldCom continues to submit a substantial number of supplemental orders requesting a change in due date. BellSouth has not fixed the problem with its due date calculator that leads it to return inaccurate due dates on *all* Firm Order Confirmations (“FOCs”) for this type of order. BellSouth withdrew its prior commitment to fix this problem on March 23 and has not yet provided a new date on which it intends to fix the problem. Lichtenberg Reply Decl. ¶ 32.

In January, BellSouth informed WorldCom that the inaccurate due dates would be fixed as part of Change Request 620 – which was scheduled for April 6 and later moved up to March 23. This was so, BellSouth assured WorldCom, even though Change Request 620 did not appear to cover supplemental orders to change due dates. In late February, however, BellSouth’s

¹ BellSouth must also offer a truly independent test environment. The Georgia Commission states that BellSouth’s test environment is acceptable. It claims that BellSouth has refuted WorldCom’s allegations that production transactions were sent to WorldCom’s test environment. Ga. PSC Comments at 24. But it does not explain how this is possible given that BellSouth never responded to WorldCom’s e-mails documenting there was a problem. There remains a significant risk of commingling of test and production orders. Moreover, the test environment has additional limitations as well. This is especially so because CLECs must manually enter special codes on every test order, making testing much more difficult than necessary. And BellSouth makes it more difficult than necessary for CLECs to test in the first place.

change control representative informed WorldCom that the change request would not cover this type of order – a position contradicted by the account team the very next day. Then, days before the March 23 change was scheduled to go into effect, BellSouth informed WorldCom that, just as WorldCom had previously suspected, the change would not correct the substantial problem identified by WorldCom. Lichtenberg Decl. ¶¶ 33-34. Indeed, BellSouth now blames the errors on the supplemental orders to change due dates on manual handling and states that no change to its systems will be required to correct this problem. BellSouth's explanation makes no sense. For it to be correct, 100% of WorldCom's supplemental orders to change due dates would have to fall to manual, which BellSouth has never previously suggested would occur, BellSouth service representatives would have to err in entering the due date on 100% of these orders, and the erroneous due dates entered would have to be unrelated to the due date in BellSouth's downstream systems – which are generally correct. Lichtenberg Reply Decl. ¶¶ 35-36.

BellSouth's failure to fix the problem as promised underscores the trouble with BellSouth's change management process described above. Such an important defect should have been corrected immediately. The ever-changing information provided by different BellSouth groups also underscores the need for BellSouth to provide better communication to CLECs and to involve Information Technology personnel in this communication. Lichtenberg Reply Decl. ¶ 37.

Moreover, BellSouth's failure to fix the problem of inaccurate due dates – and to provide any date on which it now intends to fix the problem – is a substantial problem in and of itself. This problem forces WorldCom to continue to rely on manual processes to check the due dates on the supplemental orders it submits. These manual processes significantly inflate WorldCom's

costs, as WorldCom must use them on every supplemental order it submits for a change in due date. Lichtenberg Reply Decl. ¶ 36.

C. BellSouth Fails to Process Orders Accurately

BellSouth still has not shown that it can process orders accurately. Birch and Network Telephone, for example, both continue to experience significant problems with order accuracy, as does WorldCom. DOJ notes ostensible improvements in BellSouth's service order accuracy, as measured by BellSouth's metrics, but criticizes BellSouth for unilateral changes to the metrics that make it more difficult to assess whether improvement has occurred. DOJ Eval. at 13-14. But KPMG's Florida Exceptions regarding order accuracy remain open. WorldCom continues to experience mis-provisioning of features at roughly the same rate it has experienced for many months. Lichtenberg Reply Decl. ¶ 19. Moreover, DOJ does not address service order accuracy concerns that are not measured by the metrics – such as misrouting of intraLATA calls, loss of dial tone, or delayed updates to CSRs.

1. Mis-routing of IntraLATA Calls.

BellSouth continues to make errors in order processing that lead it to mis-translate its switches and assign the incorrect intraLATA carrier to customers. In fact, the problem has grown worse. The latest numbers show 4,220 customers with misrouted intraLATA calls in WorldCom's active records. Lichtenberg Reply Decl. ¶ 9. BellSouth continues to ignore this problem entirely. It has made no effort to resolve the problem despite its obvious importance.

Instead, contrary to its prior admission of a problem, BellSouth now asserts that there is no problem at all – that intraLATA calls of WorldCom customers are appropriately routed to

BellSouth's switches because BellSouth has expanded the local calling area for these customers. This explanation appears to be incorrect. Lichtenberg Reply Decl. ¶ 12. But if it were correct, this explanation would indicate an even greater problem than WorldCom previously understood. WorldCom has not agreed that BellSouth can expand the local calling area for its customers. By expanding the local calling area, BellSouth deprives the intraLATA carrier, generally WorldCom, of the revenue associated with intraLATA calls because those calls no longer pass through its switches where it records the information used to bill the customer. Lichtenberg Reply Decl. ¶¶ 13-14.

WorldCom theoretically could, as BellSouth suggests, take the information BellSouth transmits to it on the Daily Usage Feed ("DUF"), and use that information to bill its customers intraLATA rates for calls that were considered intraLATA calls when the customer was a BellSouth retail customer. This would be an arduous undertaking. Moreover, if WorldCom pursued this course, WorldCom customers would have no choice of intraLATA carrier. All WorldCom local customers would be billed by WorldCom for intraLATA calls (even though the calls passed through the BellSouth switches). This would seemingly violate the requirement of dialing parity. BellSouth retail customers have their choice of intraLATA carrier, but WorldCom customers would have no such choice. Lichtenberg Reply Decl. ¶¶ 15-16.

2. Delayed Updating of CSRs.

In addition to misrouting of intraLATA calls, BellSouth's order processing also continues to lead to delays in updates to Customer Service Records ("CSRs") to reflect that customers have migrated to CLECs. BellSouth has acknowledged that 7% of CSRs are not updated a full 72

hours after completion of an order, and it is possible many are not updated for far longer.

Lichtenberg Reply Decl. ¶ 23. WorldCom recently audited 40 of its orders that were rejected for reasons such as “CLEC does not own the account” and determined that for at least 38% of the orders, the rejects were caused by delayed updates to the CSRs. Because the CSRs did not reflect that the customers belonged to WorldCom, the systems would not accept subsequent orders to change features or make other changes. In addition to the inaccurate rejects, BellSouth’s delay in updating the CSRs can lead to double billing. Lichtenberg Reply Decl. ¶ 22.

3. Loss of Dial Tone.

BellSouth’s order processing errors – in particular, its failure to place the proper codes on the two services orders BellSouth created from every CLEC order – also have continued to lead to loss of dial tone. Of course, on March 23, BellSouth implemented a new process – the Single C process that will ostensibly eliminate the problem of lost dial tone. But it is too early to know whether the Single C process is working. Lichtenberg Reply Decl. ¶ 28.

WorldCom conducted testing of the Single C order process in the BellSouth CAVE prior to the implementation of that release. The initial orders flowed successfully into the BellSouth interface but since the CAVE does not go all the way to the back-end legacy systems, WorldCom will not know the success or failure of this release until actual customer orders are provisioned. So far, BellSouth has identified an anomaly but it is too soon to tell the extent of the problem. Lichtenberg Reply Decl. ¶¶ 29-30. As for the two service order process in place when BellSouth applied, it is now clear that this process led to far more problems than BellSouth previously

acknowledged. After years of contending that most of the lost dial tone experienced by WorldCom customers had nothing to do with migration, BellSouth has now provided information showing that at least some of the lost dial tone BellSouth has attributed to problems unrelated to the two service order process is actually the result of that process. Indeed, BellSouth has made an astonishing admission. BellSouth has acknowledged that because of the two service order process, it sometimes changes a customer's facilities during the course of a UNE-P migration. Not surprisingly, the change in facilities sometimes leads to loss of dial tone or degradation of service – that then is reported as a problem with facilities. There should never be a change of facilities on a UNE-P migration order. Lichtenberg Reply Decl. ¶¶ 25-27 & Att. 8.

The Georgia Commission suggests that WorldCom's statistics on lost dial tone are overstated because WorldCom calculates lost dial tone within 30 days of migration, rather than within 5 days of migration. Ga. PSC Comments at 22. But WorldCom has experienced lost dial tone – that BellSouth acknowledges was caused by the two service order process – beyond the 5 day period. Moreover, the sheer volume of lost dial tone WorldCom has experienced within 30 days of migration shows that the lost dial tone is related to the migration process. BellSouth has consistently refused to provide information showing the percentage of lost dial tone experienced by retail customers in a 30 day period, but it is almost certainly far lower than that experienced by WorldCom customers.

Thus, order accuracy problems continue to cause significant problems for WorldCom. Even if one of those problems has now been corrected with the move to a Single C process, something that is too early to evaluate, BellSouth's overall service order accuracy performance must improve significantly before it obtains section 271 authority.

D. BellSouth Manually Processes Too Many Orders

As AT&T, Birch and Network Telephone confirm, BellSouth continues to manually process far too many orders as a result of limitations of its own systems. New information BellSouth has provided to WorldCom further demonstrates that this is so.

Shortly before WorldCom filed its prior comments, BellSouth provided a breakdown of a sample of WorldCom orders that were manually processed. This breakdown showed that the vast majority of sampled orders were manually processed either because the retail customer had call forwarding or voice mail or because the orders included the “ZDCO,” “OZIP” or “OISF” Feature Identifiers (“FIDs”). We have previously emphasized that basic UNE-P orders for customers with call forwarding or voice mail should flow through.

It is now clear that the same is true for orders with the ZDCO, OZIP or OISF FIDs. Initially, BellSouth was unable to explain at all what these FIDs were. It subsequently provided a limited explanation that provided very little clarification. But BellSouth did acknowledge that orders with these FIDs were manually processed as a result of BellSouth errors. BellSouth placed these FIDs on the orders as a result of limitations in its own systems. Lichtenberg Reply Decl. ¶¶ 40-42.

The impact of these limitations is significant. BellSouth provided a breakdown of WorldCom’s Florida orders that showed that 18% of WorldCom’s orders were manually processed as a result of BellSouth errors related to these FIDs, along with the voice mail/call forwarding issue. Lichtenberg Reply Decl. ¶ 43. There is no reason to think the result is any different in Georgia. Eighteen percent manual fall out as a result of particular BellSouth errors is far too high. WorldCom’s orders are basic UNE-P orders that ostensibly were designed to flow

through and all of which should flow through.

No BOC has been authorized to provide in-region long distance service while manually processing very basic types of UNE-P orders as a result of its own errors. In prior applications, a third-party test or other evidence indicated that almost all orders designed to flow through would flow through in the absence of CLEC errors. Here, that is not the case.

The Georgia Commission states that BellSouth's flow-through rates are improving, but it acknowledges that BellSouth's flow-through rate falls short of the Commission's own benchmarks. Ga. PSC Comments at 16. The Georgia Commission's analysis also presumes that BellSouth's flow-through numbers are accurate; yet it is clear that BellSouth is counting many orders that fall out as a result of its own errors as flow through orders. Lichtenberg Reply Decl. ¶ 42. Moreover, the Commission does not discuss BellSouth's failure to automate basic types of UNE-P orders or even to conduct the root-cause analysis necessary to determine why basic UNE-P orders are falling out.

BellSouth has been promising since October to automate processing of orders for customers with voice mail or call forwarding, but no fix is even scheduled until late May. BellSouth did not even identify the ZDCO and OZIP FIDs as a major source of manual fall out until February. And it only identified this issue in February as a result of constant pressure from WorldCom to conduct a root cause analysis of causes of manual fall out. BellSouth has not yet provided a date on which it will automate processing of orders on which it has added these FIDs. Until it fixes these problems, it should not be granted section 271 authority.

E. BellSouth Fails to Provide Complete Line Loss Reports

BellSouth has not corrected the deficiencies in its line loss report. Indeed, BellSouth has now acknowledged a significant additional problem on the automated line loss report it transmits to WorldCom. Lichtenberg Reply Decl. ¶ 5. WorldCom's audits also show the problem has gotten worse, despite a February 28 fix implemented by BellSouth that was supposed to ensure the line loss report was complete. Recent audits show that approximately 20% of customers are left off of the automated line loss report, which is a staggering proportion. Lichtenberg Reply Decl. ¶ 6.

Moreover, WorldCom's audit compared the data on the automated line loss report with the data on BellSouth's web site. But the data on the web site itself apparently does not include all of the line loss information. In Florida, KPMG recently opened an Exception because BellSouth failed to post 29% of line loss reports to its web site in a timely manner.

Accurate line loss reports are critical to a CLEC's ability to bill its customers accurately and avoid double billing. WorldCom's systems are set up based on automated line loss reports, so it is vital that BellSouth fix the automated reports. Lichtenberg Reply Decl. ¶ 6. Yet BellSouth has been unable to do so even though WorldCom has been complaining about this problem since August. Instead, BellSouth has again offered a series of different explanations for the line loss problem, again emphasizing the need for better assistance for CLECs and a better change management process.

CONCLUSION

BellSouth's Georgia-Louisiana application should be denied.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Lisa Smith", is written over a horizontal line.

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March 28, 2002

Service List

I, Lonzena Rogers, do hereby certify, that on this twenty-eighth day of March, 2002, that I have caused a true and correct copy of WorldCom, Inc.'s Reply Comments in the matter of CC Docket No. 02-35 to be delivered by United States Postal Service first class mail, hand delivery or e-mail to the following:

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TAB A

Before the
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| InterLATA Services in Georgia and Louisiana |) | |
| _____ |) | |

DECLARATION OF SHERRY LICHTENBERG

1. I am the same Sherry Lichtenberg who filed a declaration on OSS in response to BellSouth's application for section 271 authorization in Georgia and Louisiana on March 4, as well as declarations in response to BellSouth's application for these same states last Fall. The purpose of this reply declaration is to update my discussion of the status of BellSouth's OSS development. I will not repeat what I have said previously but instead will only comment on what has changed.

2. Unfortunately, the only significant OSS development in recent weeks is the introduction of a single C order process to reduce the loss of dial tone. It is too early to assess whether this change has been successful. Otherwise, the key defects we have focused on previously continue to exist. Most fundamentally, with one apparent exception, BellSouth has yet to agree to vital modifications to its change management process. It is essential that BellSouth fix this process, because without a more effective change management process, even systems that are working today will assuredly be inadequate tomorrow.

Line Loss Notification

3. BellSouth is not yet transmitting accurate line loss reports – which almost certainly is leading to double billing of a significant number of customers. After performing its analysis

showing that 2.3% of the line loss notifications continue to be left off of the NDM file that BellSouth transmits to MCI, MCI provided this analysis to BellSouth on March 5. As we show below, the problem has only worsened despite BellSouth's ostensible fix on February 28 to improve the comprehensiveness of the line loss report.

4. The February 28 fix was supposed to ensure that all line losses were included on the NDM report. Previously, one cause of the incomplete line loss reports was that, when a customer switched from MCI to BellSouth, BellSouth retail representatives manually had to place a code on the retail order for the order to show up in the line loss reports. The February 28 fix was supposed to eliminate this problem by putting an edit in the system to ensure the representatives added the proper code.

5. On March 18, however, MCI received a phone call from BellSouth informing us that there is apparently an additional problem with the line loss reports that BellSouth had not previously reported. BellSouth explained that the NDM file MCI receives uses the Major Account Number ("MAN") FID to show line loss, while the web site uses the Alternate Exchange Carrier Name ("AECN") FID. Yesterday, on March 27, BellSouth called to say that the NDM script is only retrieving the MAN FID when it should be retrieving the AECN information. This is the first time that BellSouth has provided this explanation even though MCI has been asking about line loss issues since last August.

6. BellSouth claimed in its phone calls that it will fix the AECN/MAN issue on April 7, and we hope that it does so. In the interim, BellSouth again plans to transmit recovery data showing what is missing from the line loss report, again forcing MCI into a manual work around that precludes it from using its automated systems. For now, it is clear that MCI cannot rely on the automated NDM report to obtain line loss information. Indeed, the problem appears to be much

worse than we reported previously. On March 5, MCI pulled 2,101 telephone numbers reported as lost on BellSouth's web site. As of March 25, BellSouth had transmitted only 1,666 of these on the NDM report – a failure rate of *more than 20%*. On March 11, MCI pulled 1,991 telephone numbers from the web site. As of March 25, BellSouth had transmitted only 1,583 of these on the NDM report, which again is a failure rate of more than 20%. (Att. 1.)¹

7. KPMG recently opened Exception 158 in Florida because "BellSouth's CLEC Line Loss Report does not update in a timely manner." (Att. 2.) KPMG found that BellSouth failed to post 29% of line loss reports to its *web site* in a timely manner. As I discussed above, many of the line loss reports on the web site are not included on the NDM reports. So the fact that the web site is inaccurate shows that the NDM reports are even more inaccurate than previously thought.

Service Order Accuracy

8. The problems that MCI has experienced as a result of BellSouth's failure to accurately process orders are ongoing. BellSouth order processing errors continue to lead to misrouting of intraLATA calls, inaccurate provisioning of features, delayed updates to Customer Service Records ("CSRs") and loss of dial tone.

A. Misrouting of IntraLATA Calls

9. BellSouth has taken no steps to correct the mistranslation of switches that leads to incorrect routing of intraLATA calls. As of March 25, based only on active records, not records archived on January 25, 2002, MCI has 4,220 customers whose intraLATA calls are being misrouted – with 37,097 active call records routed incorrectly. This is up from 15,904 call records for 2,694 customers as of March 1. Moreover, the 37,097 active call records that are

¹ MCI also pulled data off the web site on March 18. Almost all of the ANIs pulled on March 18 were transmitted via NDM by March 25. However, the March 18 data is suspect, for on that day there were less than 1/3 as many ANIs on the web site for MCI as there were in preceding days or subsequent days. This suggests the March 18 data may be unreliable.

inaccurate in the 60 days since MCI last archived records on January 25 shows a worsening trend in another way. 37,097 call records in 60 days is significantly more than 2/3 of the 47,000 records archived in the 90 days prior to January 25.

10. Misrouting of intraLATA calls deprives the customers of their choice of intraLATA carrier, deprives the proper intraLATA carrier of revenue, and forces the CLEC to pay BellSouth to transmit daily usage feeds (“DUF”) for call records that should never have been created in the first place. Yet despite these substantial impacts, BellSouth for months has done nothing to fix the problem. Apparently, as with other problems, BellSouth believes it does not have to act absent pressure from a regulatory body.

11. BellSouth now states that there really is no problem with misrouting of intraLATA calls. Ruscilli/Cox Decl. ¶¶ 5-9. According to BellSouth, when customers migrate from BellSouth to a CLEC, BellSouth expands the local calling area for the customers so that what were formerly intraLATA calls are thereafter local calls. This is inconsistent with BellSouth’s prior acknowledgment that the intraLATA calls were misrouted as a result of switch translation issues. Scollard Reply Aff. ¶ 2. It is amazing that BellSouth continues to provide new and different information in filings that it fails to provide directly to MCI on a business to business basis, despite repeated requests.

12. Moreover, BellSouth’s explanation is dubious at best. MCI has found customers in both Georgia and Florida for whom intraLATA calls are being routed to the MCI intraLATA switch, showing that BellSouth’s explanation does not apply to all customers. In addition, calls for many of these customers are being routed to BellSouth’s switch some of the time for intraLATA calls and to MCI’s switch for other intraLATA calls – even though these are calls to the same number! For example, on February 2, 2002, customer 4IM88191 made three toll calls from 770-

252-4614 to 706-882-1897. Two of the three calls were on the customer's MCI invoice dated February 3, 2002, meaning that the calls were routed to the MCI switch. The third was on the DUF transmitted by BellSouth, meaning that it was routed to a BellSouth switch. This is not an isolated example. Indeed, MCI has identified 80 customers for whom some intraLATA calls were routed last month to MCI switches and some to BellSouth switches. Twelve of these customers had calls to the same number routed to MCI switches on some occasions and to BellSouth switches on other occasions.

13. Even if BellSouth's new explanation were correct, however, it does not resolve the problem. BellSouth states that "[m]any CLECs . . . have agreed to LATA-wide local termination of UNE-P." Ruscilli/Cox Aff. ¶7. MCI is not one of them. MCI never gave BellSouth permission to change the scope of the calling area for its customers. (Indeed, MCI has been unable to locate any documentation regarding BellSouth's contention that this change was to apply to all CLECs and to all local toll calls.) This change would have the same negative effects discussed above. The calls would be routed through the BellSouth switch, instead of the switch of the intraLATA carrier. This would deprive the intraLATA carrier – generally MCI – of revenue. It would also lead BellSouth to transmit records for these calls to the CLEC on the DUF and to bill the CLEC for these records – even though these should not have been local calls in the first place.

14. Indeed, BellSouth does not in the end really defend its practice as acceptable for carriers such as MCI that also have an intraLATA subsidiary. BellSouth acknowledges that "[t]he enlarged calling scope . . . can impact differently CLECs that also have an intraLATA tollcarrier subsidiary (i.e., MCI and WorldCom). In this case, the majority of the CLEC's end users would show the Local Presubscribed Interexchange Carrier ('LPIC') Code of the toll subsidiary. The

toll subsidiary, however, would not be able to carry and automatically bill for some intraLATA toll traffic due to the larger footprint of the UNE-P local calling scope.” Ruscilli/Cox. Aff. ¶ 8. In other words, the BellSouth practice would result in loss of revenue for the intraLATA carrier – generally MCI.

15. BellSouth suggests that MCI could nonetheless bill for the traffic routed to BellSouth switches because it could use the DUF records to determine which calls were previously considered intraLATA calls and again bill these calls as intraLATA calls. That is absurd. MCI’s systems are set up to bill intraLATA calls based on traffic at MCI’s switches. It would take enormous effort and expense to take the DUF, separate those calls that were formerly considered intraLATA calls, and bill them as intraLATA calls.

16. Moreover, if MCI did undertake this effort, there would be no dialing parity. A customer who chose MCI as a CLEC would automatically have his intraLATA calls routed to the BellSouth switch. He would in turn be billed for those calls as an MCI intraLATA customer. There would be no way that he could choose a different intraLATA carrier, such as AT&T. In contrast, a BellSouth retail customer could choose whatever intraLATA carrier he wanted.

17. Presumably that is why BellSouth previously did not state that it would always provide a LATA-wide calling area for CLEC customers. In fact, in a March 22, 2001 presentation, BellSouth provided call flows showing that UNE-P calls were supposed to follow the intraLATA PIC. (Att. 3.) In a May 18, 2001 carrier notification letter, BellSouth announced that CLECs had the *option* of entering an agreement with BellSouth under which local calling areas would be expanded to be LATA wide. (Att. 4.) Under this option, however, the CLEC had to select BellSouth as the intraLATA PIC and BellSouth would then bill the CLEC for UNE transport and switching charges associated with using the BellSouth LPIC. A May 23, 2001 BellSouth

presentation similarly shows LATA-wide local calling as an option available to CLECs. (Att. 5.) For CLECs that chose not to pursue this option, however, CLEC customers would receive the same dialing arrangements as they did as BellSouth retail customers – in order to receive dialing parity. (Att. 5.) MCI did not pursue this option. But BellSouth now indicates that MCI had no choice.

18. BellSouth implicitly admits its mistake. BellSouth states that it “has been working to resolve this issue,” Ruscilli/Cox Aff. ¶9, thereby acknowledging that there is an issue that needs resolution. Of course, despite MCI’s repeated requests for information over many months on misrouting of intraLATA calls, BellSouth’s filing in this docket is the first time BellSouth has provided the explanation about expanded calling scope. It is also the first time that MCI received BellSouth’s promise of a planned fix.

B. Erroneous Provisioning of Features

19. BellSouth also has not ensured that features are provisioned correctly. As far as we are aware, BellSouth has not taken any steps to fix this problem since MCI conducted its last audit showing continuing problems in this area. An MCI audit of 400 customers who purchased MCI service between February 17 and February 23 shows that, as of March 27, 390 orders had been provisioned and remained MCI customers. (MCI had not received line loss notifications for 3 of the 8 customers who returned to BellSouth). Of the 390 provisioned orders, ten accounts had feature discrepancies (such as incorrect blocking options) and two accounts showed that the CSR had not been updated to reflect MCI ownership – more than a month after service had been sold. This is an error rate of 3.1%. – calculated as a percentage of all orders, not just manually processed orders. There is no excuse for such a high number of important errors.

20. KPMG's numerous exceptions in Florida concerning inaccurate order processing remain open. BellSouth's "revised" metric on order accuracy has not convinced KPMG that its order accuracy is now acceptable.

C. BellSouth Does Not Update CSRs In A Timely Fashion

21. BellSouth also has taken no new steps to ensure that it updates CSRs in a timely manner, a problem that results from defects in BellSouth's ordering process. Delays in updating the CSRs lead to rejects and double billing. When, after receiving a CLEC order, BellSouth fails to update its CSR to reflect that the CLEC has become the customer of record, BellSouth will reject any supplemental order from that CLEC with the message "CLEC does not own this account" or other similar reasons. MCI has been receiving a relatively high percentage of rejects for these reasons but did not know how many of these rejects were attributable to BellSouth's delay in updating the CSRs.

22. MCI recently took a sample of 40 orders (out of 153) that were rejected in Georgia and Florida the week of March 8 for reasons such as "CLEC does not own this account." On March 11, MCI pulled the CSRs for these 40 customers. Although in the week of March 8 the CSRs had reflected that MCI did not own the accounts, on March 11, 7 of 20 sampled CSRs in Georgia and 8 of 20 sampled CSRs in Florida reflected MCI ownership of the account -- a total of 37.5% of the sampled orders. Presumably this percentage grew larger as additional CSRs were updated. But at least for the 37.5%, it is clear that the reason the CSRs did not reflect MCI ownership the week of March 8 was that BellSouth had failed to update the CSRs in a timely fashion. It is reasonable, therefore, to assume that at least 37.5% of orders BellSouth rejects for reasons such as "CLEC does not own this account" are invalid rejects. This amounts to 2.9% of the total rejects transmitted by BellSouth to MCI.

23. In its March 27, 2002 *ex parte*, BellSouth states that the percentage of CLEC orders that were sent to the hold file was only .6% in January in Georgia. But BellSouth has previously indicated that the hold file is not the only cause of delays in updates to the CSRs. Moreover, in a presentation BellSouth made in Florida, BellSouth stated that the CSR was only updated within 24 hours of order completion 80% of the time, and was only updated within 72 hours 93% of the time. (Att. 6.) But CLECs often send supplemental orders within the first 72 orders. Moreover, for the 7% that were not updated in 72 hours, BellSouth did not provide data on when the updates did occur. For these customers, CLECs that want to transmit a supplemental order will have to send the order over and over again until the CSR is updated, as the CLEC has no way of knowing when the update occurs. The customer is also likely to be double billed in the interim.

D. BellSouth's Ordering Process Continues to Lead to Loss of Dial Tone.

24. BellSouth order processing errors also have continued to lead to loss of dial tone. Although this problem may have been fixed on March 23 with BellSouth's implementation of a single C order process, it is too early to determine the impact of the March 23 fix.

25. At least prior to March 23, however, it was clear that significant loss of dial tone continued. We have long maintained that the loss of dial tone experienced by MCI customers is largely due to BellSouth's two-service-order migration process. We have also suggested that BellSouth sometimes changes facilities during the process of UNE-P migration and that this leads to loss of dial tone and other problems. This has now received dramatic confirmation. MCI recently asked BellSouth to investigate the cause of lost dial tone for a number of customers. On one trouble ticket, BellSouth explained the problem as follows: "[t]he Technician found a faulty cable pair and changed the facilities." This made it appear that the problem was unrelated to the two service order process and would have occurred even if the customer had not

migrated to MCI. After investigation, however, BellSouth acknowledged that “[d]ue to a records discrepancy, the facilities changed on the conversion order. However, Single C implementation will resolve this issue.”

26. In other words, the information listed on the trouble ticket masked the true cause of the problem: because of BellSouth’s two service order process, BellSouth changed the facilities on the order, and the new facilities were faulty. This is an astonishing admission. For the first time, BellSouth has acknowledged that its two service order process sometimes causes it to change facilities on a UNE-P migration order that should never require new facilities. Moreover, it shows, as we have long suspected, that even when the trouble ticket information concerns facilities, the real source of the trouble is often the two service order conversion process.

27. BellSouth’s investigation of a second telephone number that lost dial tone produced similar results. On the trouble ticket for the second telephone number, BellSouth stated, “Open in the CO. The CO technician had worked the OE change on the order prior to receiving the trouble ticket.” After investigation, however, BellSouth stated “Due to a records discrepancy, the implementation of the OE change was performed incorrectly by RCMAC and CO personnel. The Technician has been covered on the proper implementation of an OE change order and on going training will be provided.” Once again, BellSouth acknowledged that records discrepancies and incorrect handling of the D and C order caused the end user to lose dial tone.

28. As mentioned, BellSouth’s problem with loss of dial tone may have been corrected on March 23 when BellSouth implemented a single C ordering process. It is far too early to tell, however. For now, what we know is that BellSouth’s prior process did not work, that it attempted to mask the problems with that process, that it failed to implement a new process on

time, and that, as a result, it is not yet clear that BellSouth's ordering process can avoid the most basic of all problems – loss of dial tone.

29. MCI did submit test orders to evaluate the single C process. These test orders received the appropriate responses. However, BellSouth's test environment does not include any of the back-end systems where the change to a single C process has its primary effect. Thus, the test cannot show whether the single C process is working.

30. Moreover, on March 26, 2002, three days after BellSouth implemented the single C process, BellSouth sent an outage notice reporting that "LENS and EDI are currently experiencing a system outage. Outage #2424 was first reported March 25 and verified at 9:08 AM CDT on March 26. Some denial and restoral orders are receiving "CUSTOMER SERVICE RECORD QUERY FAILED. BLP1004CSR." We do not know whether this outage is related to the single C process, but it may well be. We still do not understand the outage, because BellSouth's message suggests that the failure is a pre-order failure for LENS and EDI, yet BellSouth does not have EDI pre-ordering. Of course, BellSouth should have provided a better explanation of the outage and should have reported it when it first occurred, rather than waiting a day.

31. In any event, even if BellSouth has finally fixed the specific problem of lost dial tone, it is clear that BellSouth has not fixed its more general problem with order accuracy.

Due Date Calculator

32. As I discussed in my prior declaration, MCI frequently submits supplemental orders to change due dates. When it does so, BellSouth generally changes the due date as requested but does not return the correct due date information to MCI on the FOC. At the time I submitted my

prior declaration, we believed that BellSouth intended to fix this problem on March 23.

BellSouth has not done so, however.

33. On January 24, 2002, BellSouth stated that the problem with inaccurate due dates would be fixed with implementation of CR0620, which at the time was scheduled for April 6 and later moved up to March 23. MCI informed BellSouth that the description of CR0620 did not appear to cover supplemental orders to change due dates but was assured that the fix would cover these orders. Later on February 27, BellSouth's change control representative stated that the March 23 change would *not* cover supplemental orders to change due dates. The next day, however, the account team said the change request would include such orders.

34. Then, last week, only days before the March 23 change, BellSouth informed MCI that the change would not fix the problem experienced by MCI. The change would only fix "Supplemental 3s" – supplemental orders that requested a number of different changes – but would not cover "Supplemental 2s" – supplemental orders that requested only a change in due date. Thus, BellSouth finally made clear that the change request would not fix the problem experienced by MCI.

35. BellSouth attempted to excuse this failure by asserting that the problems on MCI's orders were not related to a systems defect, but rather were the result of manual processing errors. If this were the correct explanation, however, it would only underscore the extent of BellSouth's manual processing and the harmful impact of such manual processing. But the truth is that BellSouth's explanation makes no sense. To begin with, the problem occurs on 100% of MCI supplemental orders to change due dates. For BellSouth's explanation to be correct, all of these orders would have to fall out for manual processing – something BellSouth has never previously admitted. Moreover, BellSouth representatives would have to make the exact same

manual errors on all of these orders. And these manual errors would have to effect only the date returned on the FOC. But BellSouth does appear to be accurately updating its CSOTs web site to reflect the due date and is generally provisioning the orders on the new due date, so somehow this “manual error” is not affecting the downstream systems into which these manual orders are entered. On the surface, this appears to be impossible. The BellSouth service representative types the order into the BellSouth systems. The same systems return the FOC, update the CSOTs web site, issues the service orders to migrate the customer, and issue the service order completion. Thus, a manual error in step 1 would seem certain to cause errors in the steps that follow. MCI continues to press BellSouth for an adequate answer to this question. In the interim, we continue to request a software fix to the Supp 2 problem.

36. BellSouth has not yet provided a new date by which it will fix this problem. The problem is important. Because MCI cannot rely on the due dates provided on the FOCs, it must manually look up the due date on every supplemental order it submits to change due dates. This adds significantly to MCI’s cost as the number of such orders is very high.

37. Moreover, BellSouth’s repeated about-faces on whether it was going to fix the due date problem on March 23 demonstrate BellSouth’s continuing problems in working effectively to correct CLEC problems and providing accurate information to CLECs. Neither BellSouth’s account team nor its change management personnel had complete information on the extent of the March 23 change. And despite the importance of the defect and the requirements in the change control process regarding correction of defects, BellSouth apparently felt no urgency to correct the defect.

Manual Processing

38. BellSouth also has not taken any steps to automate the basic UNE-P orders that fall out for manual processing. BellSouth does not plan to automate orders for retail customers with voice mail or call forwarding until May – despite saying last October that it intended to fix the problem. Contrary to BellSouth’s implication in its March 27, 2002 *ex parte*, prior to August of 2001, BellSouth never explained that such orders would fall out for manual processing and MCI never agreed that they should. As soon as MCI learned of the problem in August 2001, it protested and BellSouth promised to fix the problem. Unfortunately, it still has not done so.

39. Moreover, it has now become clear that there is a second reason basic UNE-P orders are manually processed, beyond the problems associated with voice mail or call forwarding. As I noted in my prior declaration, on February 19, after a significant delay, BellSouth finally turned over to MCI data on the causes of manual fallout on a sample of MCI orders. MCI learned for the first time that much of the manual processing on its orders was caused by the “OZIP,” “OISF,” and “ZDCO” FIDs, as well as the ZLIG FID of which it was already aware. (The ZLIG FID shows that the retail customer had voice mail or call forwarding.) MCI asked follow up questions regarding the OZIP, OISF, and ZDCO FIDs and was told that BellSouth itself did not know what they were.

40. Then, on March 5, BellSouth sent an e-mail purportedly explaining these FIDs. BellSouth stated that the OZIP FID meant that “the directory section of the retail account has incorrect format.” (Att. 7.) In other words, the orders fell out for manual processing because of internal database issues on BellSouth’s side – something never before disclosed to MCI. There is no reason that such database problems should cause orders to fall out. If BellSouth wants to clean up its databases – as it should – it must do so in a way that effects CLECs and retail

customers equally. It should not clean up the databases during the migration of customers to CLECs – which leads to delay and errors in processing of CLEC orders.

41. In the same March 5 e-mail, BellSouth explained that the OISF FID is a “Bill Fid valid for BellSouth retail accounts,” and the ZDCO FID is a “Bill Fid valid for BellSouth retail accounts in Florida.” (Att. 7.) This information continues to leaves us perplexed, and we sent an immediate response to BellSouth with additional questions. BellSouth has not yet responded to that request. One thing that is clear, however, is that these are internal BellSouth issues. Indeed, BellSouth concluded its March 5 e-mail by stating that it “has identified the flow through errors in reference to the listed FID’s and are working on a process correction; however, a targeted date of completion has not been determined.” (Att. 7.) Of course, BellSouth would have identified these issues long before February 19 if it had conducted the type of root cause analysis of manual fall out that we have always maintained is necessary.

42. BellSouth’s response also further undermines its reliance on its performance data to show acceptable levels of automation. Some of the orders that BellSouth states fell out because of the presence of the OZIP, OISF and ZDCO FIDs are designated as CLEC-errors in the spreadsheets attached to BellSouth’s message on February 19. In particular, there were 7 instances (out of 40) where the “Bill FID” reason was attributed to error number 1000 which is CLEC caused. There were also 2 instances (of 28) where the ZLIG FID (associated with call forwarding and voice mail) was attributed to CLEC errors. But all of these orders fell out as a result of internal BellSouth issues, as BellSouth has acknowledged. Such inaccurate determination of the causes of manual fall out would significantly inflate BellSouth’s flow through numbers.

43. Although BellSouth asserts that the total number of MCI LSRs affected by the call forwarding/voice mail issue was approximately 2.5% (March 27 *ex parte*), these numbers are dubious since it is clear that BellSouth sometimes lists LSRs that fall out for these reasons as CLEC errors. Even more telling, in Florida, BellSouth has provided MCI a breakdown of the number of MCI orders that fall out as a result of the OZIP, OISF, and ZDCO FIDs, as well as the ZLIG FID for retail customers with voice mail or call forwarding. (Att. 9.) This breakdown shows that 353 MCI orders fell out for these reasons in November and December of 2001. This is 18% of MCI's Florida orders in those months. Presumably, a similar percentage of Georgia orders are falling out for these reasons. There is no reason basic UNE-P orders should fall out for manual processing as a result of BellSouth systems issues. In the Verizon and SWBT regions, MCI orders do not fall out for such reasons.

Change Management

44. The most fundamental problem with BellSouth's OSS is the inadequacy of its change management process. Until today, no progress had been made in improving BellSouth's change management process since I filed my previous declaration. BellSouth had not agreed to any of the key modifications suggested by CLECs that would better ensure implementation of needed changes and implementation of those changes without disruption to CLECs. In a meeting today, March 28, it appears that BellSouth has now agreed to one key change needed to improve its change management process: it has agreed to a broader definition of CLEC-affecting change. This would be a significant improvement. But much more remains to be done.

45. It remains clear that BellSouth does not have a process in place to ensure implementation of needed changes. In fact, in KPMG's revised Interim Status Report in Georgia, which BellSouth attaches to its February 28, 2002 *ex parte*, KPMG notes that "[t]he fact that Features

with the highest priority setting, and Defects with the highest priority, have remained open for over seven months could indicate that BellSouth is either not tracking the closure of the changes, is not working appropriately to resolve the changes, or has incorrectly assigned the priority setting.” Redline version at 11. The reality is, as I have discussed before, BellSouth is not working appropriately to resolve the changes.

46. With the important exception of agreeing to a broader definition of CLEC-affecting change, BellSouth has not taken any new steps to address this problem. It has not agreed to implement prioritized changes in a fixed time period. It has not yet agreed to make billing part of the change management process. It has not agreed to greater involvement of IT personnel in the change management process. And it has not backed away from its position that its 40% proposal represents an effective way to ensure that CLEC prioritized changes are implemented.

47. Moreover, BellSouth still has not shown that it can smoothly implement those changes it does implement without causing significant harm to CLECs. I have previously discussed the problems with BellSouth’s recent efforts to implement migration by TN and parsed CSRs – including delayed provision of documentation to CLECs regarding these changes, provision of incorrect information to CLECs, and implementation of these changes before significant defects had been fixed.

48. BellSouth responded by suggesting that the releases eventually worked and indicating that all releases will always have some defects. But KPMG has confirmed what we previously maintained – BellSouth failed to provide proper notice and the level of defects was far from typical of ILEC releases generally.

49. In Exception 155, which KPMG opened in Florida on February 22, 2002, KPMG made clear that BellSouth still “fails to provide the Business rules and user requirements for Minor

releases in accordance with the intervals defined in the Change Control Process.” KPMG notes BellSouth’s delay in providing business rules for parsed CSRs. KPMG also notes that a similar failure occurred with the next release, release 10.4, which was implemented on March 23. BellSouth states that BellSouth announced that pre-order business rules for release 10.4 would be available for this March 23 release on March 8 when they should have been available on February 16, and also released user requirements months after they were due. (Att. 2.) Moreover, BellSouth did not even provide the business rules on March 8. After KPMG issued this Exception, BellSouth subsequently released carrier notification letter SN91082914 stating that the revised business rules would be released on *April 5*, after the release had been implemented. (Att. 10.)

50. As I noted in my prior declaration, KPMG also released Exception 157 based on the significant number of defects in each release. KPMG correctly concluded that this shows a failure in BellSouth’s internal testing process. This is a critical problem, and it appears to have continued. In today’s meeting, BellSouth announced that there were at least two defects in its March 23 release. Although posted on BellSouth’s web site, neither of these defects was properly announced via change control notices.

51. BellSouth also has not yet created an acceptable environment in which CLECs can test. As we have previously noted, BellSouth’s CAVE environment is not truly independent. Moreover, BellSouth requires unnecessary coordination with CLECs before testing can begin. BellSouth requires CLECs to submit a test agreement each time they want to test and to have a kickoff meeting with BellSouth for testing. In other regions, a CLEC can simply begin testing after informing the ILEC. This is important. BellSouth recently informed MCI that it could not test the single C order process because it had not returned a test agreement soon enough. But

MCI should not have been required to return a new test agreement at all, much less by a particular deadline. While BellSouth relented and allowed testing, there is no reason BellSouth should have such control to preclude testing.

52. Even after changes have been tested and implemented, BellSouth fails to work effectively with CLECs to resolve any problems they are experiencing. While BellSouth has worked with MCI to reduce some problems, such as errors in manual processing, that has often required circumventing the existing account team process. For example, the number of erroneous manual rejects received by MCI only diminished after MCI managed to get attention of a BellSouth vice president – who previously was not even aware of the problems with erroneous rejects.

53. On March 7, 2002, KPMG opened Observation 170 in Florida because “BellSouth’s External Response Team (ERT) Account Management sub-process for responding to written CLEC correspondence is not documented.” (Att. 2.) KPMG explained that without such criteria the ERT process might not be “utilized on a consistent, repeatable basis,” which could “negatively impact a CLEC’s ability to conduct business.” On March 7, KPMG also opened Observation 165 because “BellSouth’s Account Team/CLEC Care Team Procedures documentation is unclear.” (Att. 2.) These observations supplemented KPMG’s prior observations regarding the account team process. KPMG had previously observed that “[t]he BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes.” Obs. 115 (Sept. 17, 2001). (Att. 2.)

54. MCI’s experience is consistent with KPMG’s findings. BellSouth continues to take months to address basic CLEC questions, in part as a result of its ERT process. For example, on January 3, 2002, MCI requested that BellSouth provide an explanation of how it updated a

customer's CSR, as well as the switch information on a customer, when the customer migrated to a CLEC. BellSouth initially refused to answer the question and then attempted to avoid it. On January 24, BellSouth finally stated that the process was going through ERT. The ERT response was not provided until February 25, 2002.

55. Similarly, as I discussed above, at the beginning of January 2002, MCI requested that BellSouth analyze a sample of MCI orders that had fallen out for manual processing to determine the cause of the fall out. BellSouth estimated that it would provide such a sample in two weeks. It later delayed this and stated that it would provide the information on January 31. On January 31, however, BellSouth stated that the request was going through ERT and provided no date on which it expected to respond to the request. Just as KPMG suggested, the ERT process was used as an excuse to delay answering MCI's questions. Finally, on February 19, the day after it was requested to do so by a Florida Commissioner, BellSouth provided the requested information. But this information was incomplete. As noted above, BellSouth still has not provided complete answers describing the ZDCO and other FIDs listed in its February 19 response.

56. BellSouth's lack of responsiveness is apparent even when it does not turn to the ERT process. For example, on October 3, 2001, shortly after MCI first learned that orders for customers with voice mail and call forwarding fall out for manual handling, BellSouth promised that it would quickly fix the problem. For months thereafter BellSouth failed to provide an update. BellSouth later said that a fix would be implemented in 2002; but then retracted this promise. Finally, on February 18, BellSouth stated that a fix would be implemented on May 18, 2002. MCI continues to request documentation showing the change will occur. But BellSouth has not provided the documentation. MCI is concerned that, as with BellSouth's promise to fix the due date problem on supplemental orders, promises not accompanied by written

documentation will dissolve before implementation. Additional examples of BellSouth's lack of responsiveness are provided in Attachment 11.

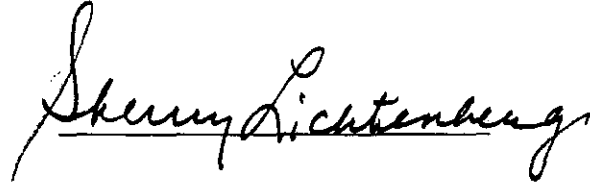
57. The fact is that the defect at the core of all of BellSouth's OSS problems to date – its inadequate change management process – has not been fixed. While BellSouth has made some progress in addressing particular OSS problems in recent months, it has not yet shown that its change management process works. Nor has it adopted modifications sufficient to ensure that this process will work in the future. Until it does, fixes to current OSS problems will prove only temporary. Future changes in the marketplace will create need for additional changes to BellSouth's OSS, and without any assurance that those changes will be made – and implemented smoothly – competition will become more difficult, rather than less difficult, in the future.

CONCLUSION

58. This concludes my declaration on behalf of WorldCom, Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 28, 2002.

A handwritten signature in cursive script that reads "Sherry Lichtenberg". The signature is written in black ink and is positioned to the right of the date line.

ATTACHMENT 1

| | ANIs Pulled From BST GUI on 3/5/02 Deduped | | ANIs Pulled From BST GUI on 3/11/02 Deduped | | ANIs Pulled From BST GUI on 3/18/02 Deduped | | 3/5 and 3/11 and 3/18 BST GUI ANIs Deduped | |
|-----------------------------------|--|--|---|--|---|--|--|--|
| GUI LITERAL (ABBREVIATED) | Total #ANIs | #ANIs Not Sent via NDM or Recovery File as of 3/25/02 | Total #ANIs | #ANIs Not Sent via NDM or Recovery File as of 3/25/02 | Total #ANIs | #ANIs Not Sent via NDM or Recovery File as of 3/25/02 | Total #ANIs | #ANIs Not Sent via NDM or Recovery File as of 3/25/02 |
| TRANSFERRED IN ERROR | 93 | 17 | 107 | 15 | 33 | 0 | 219 | 18 |
| LINE LOSS | 1,101 | 218 | 1,124 | 196 | 443 | 1 | 2,472 | 219 |
| ABANDON | 147 | 23 | 125 | 21 | 46 | 0 | 297 | 23 |
| NO FURTHER NEED / SVC TRANSFERRED | 759 | 177 | 633 | 176 | 142 | 1 | 1,360 | 181 |
| NON-PAYMENT | 1 | 0 | 2 | 0 | 1 | 0 | 4 | 0 |
| Total | 2,101 | 435 | 1,991 | 408 | 665 | 2 | 4,352 | 441 |

"Transferred In Error" ANIs Not
Sent via NDM

| LITERAL (ABBREVIATED) | ANI | MIGRATE DATE TAKEN FROM GUI |
|-----------------------|------------|--------------------------------------|
| TRANSFERRED IN ERROR | 7705839904 | 2/27/02 |

"Line Loss" ANIs
Not Sent via NDM

| LITERAL (ABBREVIATED) | ANI | MIGRATE DATE TAKEN FROM GUI |
|-----------------------|------------|--------------------------------------|
| LINE LOSS | 7704737259 | 2/26/02 |

| | | |
|----------------------|------------|--------|
| TRANSFERRED IN ERROR | 6784228199 | 3/1/02 |
| TRANSFERRED IN ERROR | 7704137614 | 3/2/02 |
| TRANSFERRED IN ERROR | 3053863912 | 3/4/02 |
| TRANSFERRED IN ERROR | 3054445042 | 3/4/02 |
| TRANSFERRED IN ERROR | 3058956648 | 3/4/02 |
| TRANSFERRED IN ERROR | 4043559906 | 3/4/02 |
| TRANSFERRED IN ERROR | 4045080867 | 3/4/02 |
| TRANSFERRED IN ERROR | 4047674670 | 3/4/02 |
| TRANSFERRED IN ERROR | 5613943469 | 3/4/02 |
| TRANSFERRED IN ERROR | 6787960644 | 3/4/02 |
| TRANSFERRED IN ERROR | 7703388585 | 3/4/02 |
| TRANSFERRED IN ERROR | 7707841602 | 3/4/02 |
| TRANSFERRED IN ERROR | 7708775454 | 3/4/02 |
| TRANSFERRED IN ERROR | 7709647580 | 3/4/02 |
| TRANSFERRED IN ERROR | 7709799860 | 3/4/02 |
| TRANSFERRED IN ERROR | 9544676643 | 3/4/02 |
| TRANSFERRED IN ERROR | 4046915772 | 3/6/02 |

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|-----------|------------|---------|
| LINE LOSS | 9043536031 | 2/26/02 |
| LINE LOSS | 3057741939 | 2/26/02 |
| LINE LOSS | 4045340511 | 2/26/02 |
| LINE LOSS | 9043580070 | 2/26/02 |
| LINE LOSS | 7707607043 | 2/28/02 |
| LINE LOSS | 7704830357 | 2/28/02 |
| LINE LOSS | 9549214046 | 2/28/02 |
| LINE LOSS | 7703231938 | 2/28/02 |
| LINE LOSS | 7709784041 | 2/28/02 |
| LINE LOSS | 9544544675 | 2/28/02 |
| LINE LOSS | 7709871722 | 3/1/02 |
| LINE LOSS | 9547210842 | 3/1/02 |
| LINE LOSS | 4042987977 | 3/1/02 |
| LINE LOSS | 4048810496 | 3/1/02 |
| LINE LOSS | 6785657608 | 3/1/02 |
| LINE LOSS | 7704362457 | 3/1/02 |
| LINE LOSS | 7705674216 | 3/1/02 |
| LINE LOSS | 7708368552 | 3/1/02 |
| LINE LOSS | 4048419819 | 3/2/02 |
| LINE LOSS | 4042129671 | 3/2/02 |
| LINE LOSS | 7704511597 | 3/2/02 |
| LINE LOSS | 7707530321 | 3/2/02 |
| LINE LOSS | 4045340327 | 3/4/02 |
| LINE LOSS | 7704911034 | 3/4/02 |
| LINE LOSS | 4047525085 | 3/4/02 |
| LINE LOSS | 6783541077 | 3/4/02 |
| LINE LOSS | 4046889262 | 3/4/02 |
| LINE LOSS | 7704775644 | 3/4/02 |
| LINE LOSS | 7704984412 | 3/4/02 |
| LINE LOSS | 7704600417 | 3/4/02 |
| LINE LOSS | 4047588856 | 3/4/02 |
| LINE LOSS | 4046340470 | 3/4/02 |
| LINE LOSS | 7708309158 | 3/4/02 |
| LINE LOSS | 7708342755 | 3/4/02 |
| LINE LOSS | 7704652759 | 3/4/02 |

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| LINE LOSS | 6784060975 | 3/4/02 |
| LINE LOSS | 7706641800 | 3/4/02 |
| LINE LOSS | 7708982974 | 3/4/02 |
| LINE LOSS | 7705137166 | 3/4/02 |
| LINE LOSS | 7708130857 | 3/4/02 |
| LINE LOSS | 7706130626 | 3/4/02 |
| LINE LOSS | 7704457041 | 3/4/02 |
| LINE LOSS | 5613679349 | 3/4/02 |
| LINE LOSS | 6785468280 | 3/4/02 |
| LINE LOSS | 3055341276 | 3/4/02 |
| LINE LOSS | 7704347974 | 3/4/02 |
| LINE LOSS | 7703586776 | 3/4/02 |
| LINE LOSS | 6783540336 | 3/4/02 |
| LINE LOSS | 7702770442 | 3/4/02 |
| LINE LOSS | 4045223467 | 3/4/02 |
| LINE LOSS | 7702331845 | 3/4/02 |
| LINE LOSS | 6789452222 | 3/4/02 |
| LINE LOSS | 6787975956 | 3/4/02 |
| LINE LOSS | 7706848390 | 3/4/02 |
| LINE LOSS | 7704593222 | 3/4/02 |
| LINE LOSS | 7707256736 | 3/4/02 |
| LINE LOSS | 7705039193 | 3/4/02 |
| LINE LOSS | 4047629693 | 3/4/02 |
| LINE LOSS | 7709489548 | 3/4/02 |
| LINE LOSS | 7709715520 | 3/4/02 |
| LINE LOSS | 7709811590 | 3/4/02 |
| LINE LOSS | 4046291000 | 3/4/02 |
| LINE LOSS | 7709660508 | 3/4/02 |
| LINE LOSS | 4042411895 | 3/4/02 |
| LINE LOSS | 4042415575 | 3/4/02 |
| LINE LOSS | 3059198484 | 3/4/02 |
| LINE LOSS | 9545221283 | 3/4/02 |
| LINE LOSS | 7709311777 | 3/4/02 |
| LINE LOSS | 4044991252 | 3/4/02 |
| LINE LOSS | 9549210476 | 3/4/02 |

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| LINE LOSS | 9047913110 | 3/4/02 |
| LINE LOSS | 7709284775 | 3/4/02 |
| LINE LOSS | 3058952145 | 3/4/02 |
| LINE LOSS | 9547355595 | 3/4/02 |
| LINE LOSS | 7709398180 | 3/4/02 |
| LINE LOSS | 3059360394 | 3/4/02 |
| LINE LOSS | 4042441721 | 3/4/02 |
| LINE LOSS | 4042482953 | 3/4/02 |
| LINE LOSS | 4042899326 | 3/4/02 |
| LINE LOSS | 4042983427 | 3/4/02 |
| LINE LOSS | 4042992801 | 3/4/02 |
| LINE LOSS | 4042997194 | 3/4/02 |
| LINE LOSS | 4042997684 | 3/4/02 |
| LINE LOSS | 4042997749 | 3/4/02 |
| LINE LOSS | 4043446784 | 3/4/02 |
| LINE LOSS | 4043491580 | 3/4/02 |
| LINE LOSS | 4043516668 | 3/4/02 |
| LINE LOSS | 4043550181 | 3/4/02 |
| LINE LOSS | 4043620232 | 3/4/02 |
| LINE LOSS | 4043662812 | 3/4/02 |
| LINE LOSS | 4043665760 | 3/4/02 |
| LINE LOSS | 4045010033 | 3/4/02 |
| LINE LOSS | 4045591858 | 3/4/02 |
| LINE LOSS | 4046243782 | 3/4/02 |
| LINE LOSS | 4046296656 | 3/4/02 |
| LINE LOSS | 4046364717 | 3/4/02 |
| LINE LOSS | 4046595112 | 3/4/02 |
| LINE LOSS | 4046813258 | 3/4/02 |
| LINE LOSS | 4047240738 | 3/4/02 |
| LINE LOSS | 4047528316 | 3/4/02 |
| LINE LOSS | 4047534688 | 3/4/02 |
| LINE LOSS | 4047538018 | 3/4/02 |
| LINE LOSS | 4047668704 | 3/4/02 |
| LINE LOSS | 4047674784 | 3/4/02 |
| LINE LOSS | 4047942987 | 3/4/02 |

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| LINE LOSS | 4047991114 | 3/4/02 |
| LINE LOSS | 4047996186 | 3/4/02 |
| LINE LOSS | 4048691586 | 3/4/02 |
| LINE LOSS | 4048740269 | 3/4/02 |
| LINE LOSS | 4048933773 | 3/4/02 |
| LINE LOSS | 6782890517 | 3/4/02 |
| LINE LOSS | 6783095867 | 3/4/02 |
| LINE LOSS | 6783426908 | 3/4/02 |
| LINE LOSS | 6783632984 | 3/4/02 |
| LINE LOSS | 6783636899 | 3/4/02 |
| LINE LOSS | 6783762407 | 3/4/02 |
| LINE LOSS | 6783763486 | 3/4/02 |
| LINE LOSS | 6783775367 | 3/4/02 |
| LINE LOSS | 6784179058 | 3/4/02 |
| LINE LOSS | 6784182754 | 3/4/02 |
| LINE LOSS | 6784940198 | 3/4/02 |
| LINE LOSS | 6785838536 | 3/4/02 |
| LINE LOSS | 6787520765 | 3/4/02 |
| LINE LOSS | 6788420406 | 3/4/02 |
| LINE LOSS | 6789450550 | 3/4/02 |
| LINE LOSS | 6789470282 | 3/4/02 |
| LINE LOSS | 6789855868 | 3/4/02 |
| LINE LOSS | 7065381047 | 3/4/02 |
| LINE LOSS | 7065381064 | 3/4/02 |
| LINE LOSS | 7702052223 | 3/4/02 |
| LINE LOSS | 7702298577 | 3/4/02 |
| LINE LOSS | 7702299619 | 3/4/02 |
| LINE LOSS | 7702532251 | 3/4/02 |
| LINE LOSS | 7702541807 | 3/4/02 |
| LINE LOSS | 7702549454 | 3/4/02 |
| LINE LOSS | 7703000806 | 3/4/02 |
| LINE LOSS | 7703063772 | 3/4/02 |
| LINE LOSS | 7703397333 | 3/4/02 |
| LINE LOSS | 7703584862 | 3/4/02 |
| LINE LOSS | 7703586848 | 3/4/02 |

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| LINE LOSS | 7703810247 | 3/4/02 |
| LINE LOSS | 7703840441 | 3/4/02 |
| LINE LOSS | 7703855793 | 3/4/02 |
| LINE LOSS | 7703859716 | 3/4/02 |
| LINE LOSS | 7704140897 | 3/4/02 |
| LINE LOSS | 7704223613 | 3/4/02 |
| LINE LOSS | 7704271296 | 3/4/02 |
| LINE LOSS | 7704430511 | 3/4/02 |
| LINE LOSS | 7704451224 | 3/4/02 |
| LINE LOSS | 7704490622 | 3/4/02 |
| LINE LOSS | 7704613149 | 3/4/02 |
| LINE LOSS | 7704635853 | 3/4/02 |
| LINE LOSS | 7704640589 | 3/4/02 |
| LINE LOSS | 7704661392 | 3/4/02 |
| LINE LOSS | 7704690991 | 3/4/02 |
| LINE LOSS | 7704726227 | 3/4/02 |
| LINE LOSS | 7704775146 | 3/4/02 |
| LINE LOSS | 7704779486 | 3/4/02 |
| LINE LOSS | 7704954020 | 3/4/02 |
| LINE LOSS | 7705041129 | 3/4/02 |
| LINE LOSS | 7705177041 | 3/4/02 |
| LINE LOSS | 7705510229 | 3/4/02 |
| LINE LOSS | 7705520610 | 3/4/02 |
| LINE LOSS | 7705673062 | 3/4/02 |
| LINE LOSS | 7705749057 | 3/4/02 |
| LINE LOSS | 7705774845 | 3/4/02 |
| LINE LOSS | 7705914973 | 3/4/02 |
| LINE LOSS | 7705928242 | 3/4/02 |
| LINE LOSS | 7706049100 | 3/4/02 |
| LINE LOSS | 7706311439 | 3/4/02 |
| LINE LOSS | 7706648505 | 3/4/02 |
| LINE LOSS | 7707185187 | 3/4/02 |
| LINE LOSS | 7707259712 | 3/4/02 |
| LINE LOSS | 7707399274 | 3/4/02 |
| LINE LOSS | 7707511514 | 3/4/02 |

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| LINE LOSS | 7707519501 | 3/4/02 |
| LINE LOSS | 7707751436 | 3/4/02 |
| LINE LOSS | 7707756782 | 3/4/02 |
| LINE LOSS | 7707863068 | 3/4/02 |
| LINE LOSS | 7707870159 | 3/4/02 |
| LINE LOSS | 7707888225 | 3/4/02 |
| LINE LOSS | 7708083922 | 3/4/02 |
| LINE LOSS | 7708138841 | 3/4/02 |
| LINE LOSS | 7708190527 | 3/4/02 |
| LINE LOSS | 7708307972 | 3/4/02 |
| LINE LOSS | 7708509309 | 3/4/02 |
| LINE LOSS | 7708693633 | 3/4/02 |
| LINE LOSS | 7708989682 | 3/4/02 |
| LINE LOSS | 7709077379 | 3/4/02 |
| LINE LOSS | 7709099808 | 3/4/02 |
| LINE LOSS | 7709148231 | 3/4/02 |
| LINE LOSS | 7709174911 | 3/4/02 |
| LINE LOSS | 7709209021 | 3/4/02 |
| LINE LOSS | 7709264566 | 3/4/02 |
| LINE LOSS | 7709357470 | 3/4/02 |
| LINE LOSS | 7709387782 | 3/4/02 |
| LINE LOSS | 7709419627 | 3/4/02 |
| LINE LOSS | 7709428755 | 3/4/02 |
| LINE LOSS | 7709437439 | 3/4/02 |
| LINE LOSS | 7709499450 | 3/4/02 |
| LINE LOSS | 7709576339 | 3/4/02 |
| LINE LOSS | 7709603843 | 3/4/02 |
| LINE LOSS | 7709609068 | 3/4/02 |
| LINE LOSS | 7709625060 | 3/4/02 |
| LINE LOSS | 7709651269 | 3/4/02 |
| LINE LOSS | 7709680583 | 3/4/02 |
| LINE LOSS | 7709686576 | 3/4/02 |
| LINE LOSS | 7709690645 | 3/4/02 |
| LINE LOSS | 7709730198 | 3/4/02 |
| LINE LOSS | 7709770520 | 3/4/02 |

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| LINE LOSS | 7709874024 | 3/4/02 |
| LINE LOSS | 7709913740 | 3/4/02 |
| LINE LOSS | 9545244752 | 3/4/02 |
| LINE LOSS | 9547411559 | 3/4/02 |
| LINE LOSS | 9547493250 | 3/4/02 |
| LINE LOSS | 9549210081 | 3/8/02 |
| LINE LOSS | 4042842469 | 3/8/02 |
| LINE LOSS | 4046966159 | 3/11/02 |

ATTACHMENT 2

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 155



Florida OSS Test
Exception 155

March 12, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Practices Verification and Validation Review (PPR1).

Exception:

BellSouth fails to provide the Business Rules and user requirements for Minor releases in accordance with the intervals defined in the Change Control Process¹. This exception was originally issued as Observation 154 (PPR1).

Background:

The BellSouth Change Control Process states "business rules associated with minor releases will be provided to Competitive Local Exchange Carriers (CLECs) at least 5 weeks prior to production.²" The Change Control process further states that "Draft user requirements for the implementation of a Minor release will be provided 19 weeks prior to production and Final user requirements for the implementation of a minor release will be provided 18 weeks prior to production.³" BellSouth Minor Release 10.3 was implemented on January 5, 2001. Minor Release 10.4 is scheduled to be implemented on March 23, 2002.

Issues:

1. BellSouth provided the Pre-Order business rules for the Parsed CSR feature, scheduled for implementation with Release 10.3, on December 18, 2001. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on November 30, 2001.
2. BellSouth Carrier Notification SN91082873 indicates that the BellSouth Pre-order Business Rules, version 12B (associated with release 10.4) will be available to CLECs on March 1, 2002. BellSouth Carrier Notification SN90182885 changed

¹ BellSouth Change Control Process, version 2.7, December 7, 2001

² BellSouth Change Control Process, version 2.7, December 7, 2001, Table 4-3, Step 10, Page 34

³ Ibid.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 155

the availability of the BellSouth Pre-Order Business Rules, version 12B to March 8, 2002. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on February 16, 2002.

3. BellSouth stated in an email to the Change Control distribution list that the Business Rules for CR 0657 would be provided on February 22, 2002. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on February 16, 2002.
4. BellSouth provided draft user requirements for Release 10.4 features on December 13, 2001. BellSouth provided final user requirements for Release 10.4 on January 29, 2002. Based on the guidelines stated in the Change Control Process, the draft and final user requirements for Release 10.4 should have been provided on November 10, 2001 and November 17, 2001 respectively.
5. BellSouth provided additional draft user requirements to Release 10.4 (for CR 0657 and 0651) on February 13-14, 2002. Final user requirements have not been published. Based on the guidelines stated in the Change Control Process, the draft and final user requirements for Release 10.4 should have been provided on November 10, 2001 and November 17, 2001 respectively.

Impact:

Failure to publish business rules and user requirements in accordance with the intervals required by CCP delays CLECs development, testing, and implementation of release features. Therefore, CLECs are unable to benefit from enhancements and corrections to the BellSouth OSS in a timely manner.

BellSouth Response:

Issue 1:

BellSouth agrees that the pre-order business rules for the parsed CSR feature were delivered later than the date prescribed by the Change Control process. However, BellSouth points out that the introduction of the parsed CSR functionality involved a large number of documents that were made available to the CLECs beginning as early as September 2001. For details on the names and delivery dates of the other documents, see the information outlined below:

- BellSouth User Specifications was provided to CLECs through the CCP on September 6, 2001. This document was discussed with CLECs on September 20, 2001.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 155

- Preliminary Field Specifications was provided to CLECs on October 12, 2001. This document contains field specific characteristics and was used by CLECs to assist in their preliminary coding efforts.
- Exceptions and Clarifications were provided to CLECs on October 12, 2001. This document provided exceptions and clarifications of CLEC requested fields.
- TAG API Guide was published on November 19, 2001. This document provides details used for coding the CLECs interface.
- CSR Job Aid was updated on November 9, 2001 to include information on parsed CSRs such as what parts of the CSR would be parsed, how that data would be returned to CLECs along with examples. On December 13, 2001 the job aid was updated to include additional information on parsed CSRs.
- Pre-Order Business Rules was updated on December 13, 2001 to include information for requesting parsed CSRs. The information updated in this document is similar to information provided in the previous documents.

CLECs have coded and tested parsed CSRs with BellSouth using the information provided in the documents listed above. BellSouth has charged its project management organization with conducting a detailed review of associated business rules documents well in advance of the posting date. This measure will ensure the timely update of all documentation related to a particular feature.

Issue 2:

Carrier Notifications SN91082873 and SN90182885 clearly state the Pre-Order Business Rules, Version 12B will be posted in conjunction with Release 10.5, not Release 10.4 as KPMG has stated in this exception. Release 10.5 is scheduled for implementation on May 18, 2002.

Issue 3:

On February 15, 2002, an e-mail was sent to the Change Control distribution list stating that business rules for CR0657 would be provided via Carrier Notification Letter on February 22, 2002. This letter did post on the specified date. CR0657, which is a mandate, addresses a Local Service Freeze that is a part of Release 10.4. The release's implementation was advanced from April 6, 2002 to March 23, 2002. Even with the earlier date, BellSouth's posting of the business rules on February 22, 2002 met the Change Control Process guidelines.

Issue 4:

BellSouth acknowledges that the draft and final user requirements for Release 10.4 were delivered later than the date prescribed by the Change Control Process. However, the Change Control Process, by nature and definition, allows BellSouth and the CLECs to make additional or unanticipated changes in the course of reviewing user requirements. When this occurs, it is understood that deliverable dates may be adversely impacted.

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 155

This situation factors into the delayed delivery of the user requirements for Release 10.4. The actual chronology of events is as follows:

December 18, 2001: During the Release 10.3 and 10.4 User Requirement Review session, CLECs asked that User Requirements include more explicit language with regard to CLEC-impacting changes. BellSouth agreed to revise and enhance the document. The minutes from this session, which are found on the CCP web site, confirm this discussion. In addition, BellSouth sent an e-mail to the CCP distribution list indicating that because of concerns raised on December 18th, the final user requirements would not be distributed until January.

January 15, 2002: A follow up User Requirement Review meeting was held.

January 23, 2002: A second follow up meeting was held.

January 29, 2002: The final user requirements were distributed in accordance with the time line stated in the aforementioned e-mail notification.

Issue 5:

December 12, 2001: The CLECs were advised that CR0657 and CR0651 were not a part of Release 10.4's original scope. Both were added to the scope as mandates. As a result, the user requirements were sent as final. It is important to remember that when mandates or enhancements are added to a release after it has been scoped, BellSouth may or may not be in a position to provide associated deliverables in accordance with "normal" intervals.

February 27, 2002: The CLEC Monthly Status Meeting was held. The Release Manager advised that future exceptions to release dates, such as those which could occur with post-scope mandates and enhancements, would be communicated as early as possible to the CLECs by way of a Carrier Notification Letter and via the CCP distribution list.

EXCEPTION 155

BellSouth Florida OSS Testing Evaluation

Date: February 22, 2002

EXCEPTION REPORT

An exception has been identified as a result of the test activities associated with the Change Management Practices Verification and Validation Review (PPR1).

Exception:

BellSouth fails to provide the Business Rules and user requirements for Minor releases in accordance with the intervals defined in the Change Control Process¹. This exception was originally issued as Observation 154 (PPR1).

Background:

The BellSouth Change Control Process states “business rules associated with minor releases will be provided to Competitive Local Exchange Carriers (CLECs) at least 5 weeks prior to production.²” The Change Control process further states that “Draft user requirements for the implementation of a Minor release will be provided 19 weeks prior to production and Final user requirements for the implementation of a minor release will be provided 18 weeks prior to production.³” BellSouth Minor Release 10.3 was implemented on January 5, 2001. Minor Release 10.4 is scheduled to be implemented on March 23, 2002.

Issues:

1. BellSouth provided the Pre-Order business rules for the Parsed CSR feature, scheduled for implementation with Release 10.3, on December 18, 2001. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on November 30, 2001.
2. BellSouth Carrier Notification SN91082873 indicates that the BellSouth Pre-order Business Rules, version 12B (associated with release 10.4) will be available to CLECs on March 1, 2002. BellSouth Carrier Notification SN90182885 changed the availability of the BellSouth Pre-Order Business Rules, version 12B to March 8, 2002. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on February 16, 2002.

¹ BellSouth Change Control Process, version 2.7, December 7, 2001

² BellSouth Change Control Process, version 2.7, December 7, 2001, Table 4-3, Step 10, Page 34

³ Ibid.

EXCEPTION 155

BellSouth Florida OSS Testing Evaluation

3. BellSouth stated in an email to the Change Control distribution list that the Business Rules for CR 0657 would be provided on February 22, 2002. Based on the guidelines stated in the Change Control Process, these business rules should have been provided on February 16, 2002.

4. BellSouth provided draft user requirements for Release 10.4 features on December 13, 2001. BellSouth provided final user requirements for Release 10.4 on January 29, 2002. Based on the guidelines stated in the Change Control Process, the draft and final user requirements for Release 10.4 should have been provided on November 10, 2001 and November 17, 2001 respectively.

5. BellSouth provided additional draft user requirements to Release 10.4 (for CR 0657 and 0651) on February 13-14, 2002. Final user requirements have not been published. Based on the guidelines stated in the Change Control Process, the draft and final user requirements for Release 10.4 should have been provided on November 10, 2001 and November 17, 2001 respectively.

Impact:

Failure to publish business rules and user requirements in accordance with the intervals required by CCP delays CLECs development, testing, and implementation of release features. Therefore, CLECs are unable to benefit from enhancements and corrections to the BellSouth OSS in a timely manner.

**KPMG Consulting / BellSouth – Account Management Communications
FLORIDA**

| | Date | Time | Routing | Details | Response Received | Business Days |
|----|-----------------|---------|-------------|--|-------------------|---------------|
| 1 | August 15, 2001 | 9:07 E | KPMG to BST | E-mail: Subject: RE: OLNS Branding Order Form | August 24, 2001 | 7 |
| 2 | August 13, 2001 | 12:22 E | KPMG to BST | E-mail: Subject: RE: OLNS Testing | August 15, 2001 | 2 |
| 3 | August 13, 2001 | 12:18 E | KPMG to BST | E-mail: Subject: RE: OLNS Branding Order Form | August 15, 2001 | 2 |
| 4 | August 7, 2001 | 9:56 E | KPMG to BST | E-mail: Subject: OLNS Branding Order Form | August 15, 2001 | 6 |
| 5 | August 6, 2001 | 15:48 E | KPMG to BST | E-mail: Subject: OLNS Testing | August 15, 2001 | 7 |
| 6 | July 27, 2001 | 14:32 E | KPMG to BST | E-mail: Subject: RE: OLNS Instructions and Application | August 1, 2001 | 3 |
| 7 | July 25, 2001 | 9:45 E | KPMG to BST | E-mail: Subject: RE: OLNS Instructions and Application | July 27, 2001 | 2 |
| 8 | July 24, 2001 | 9:59 E | KPMG to BST | E-mail: Subject: Data Request | July 24, 2001 | 0 |
| 9 | July 23, 2001 | 18:14 E | KPMG to BST | E-mail: Subject: OLNS Instructions and Application | July 24, 2001 | 1 |
| 10 | July 16, 2001 | 16:33 E | KPMG to BST | E-mail: Subject: Design Routing Codes | July 17, 2001 | 1 |
| 11 | July 5, 2001 | 13:18 E | KPMG to BST | Phone Conversation: Subject: TAG API Training | July 5, 2001 | 0 |
| 12 | June 25, 2001 | 16:23 E | KPMG to BST | E-mail: Subject: RE: CLEC to CLEC Migrations | June 26, 2001 | 1 |
| 13 | June 25, 2001 | 13:57 E | KPMG to BST | E-mail: Subject: RE: CLEC to CLEC Migrations | June 25, 2001 | 0 |
| 14 | June 25, 2001 | 9:57 E | KPMG to BST | E-mail: Subject: RE: CLEC to CLEC Migrations | June 25, 2001 | 0 |
| 15 | June 14, 2001 | 13:53 E | KPMG to BST | E-mail: Subject: RE: CLEC to CLEC Migrations | June 25, 2001 | 7 |
| 16 | June 14, 2001 | 13:53 E | KPMG to BST | E-mail: Subject: RE: CLEC to CLEC Migrations | June 14, 2001 | 1 |
| 17 | June 11, 2001 | 18:00 E | KPMG to BST | E-mail: Subject: RE: TAG API Training | June 12, 2001 | 1 |
| 18 | June 6, 2001 | 9:29 E | KPMG to BST | E-mail: Subject: RE: Billing Self Branding | June 6, 2001 | 0 |
| 19 | June 6, 2001 | 8:13 E | KPMG to BST | E-mail: Subject: TAG API Training | June 7, 2001 | 1 |
| 20 | June 5, 2001 | 11:25 E | KPMG to BST | E-mail: Subject: CLEC to CLEC Migrations | June 7, 2001 | 2 |

KPMG Consulting / BellSouth – Account Management Communications FLORIDA

| | | | | | | |
|----|----------------|---------|-------------|---|----------------|---|
| 21 | May 31, 2001 | 15:52 E | KPMG to BST | E-mail: Subject: RE: Billing Self Branding | June 6, 2001 | 4 |
| 22 | May 24, 2001 | 13:59 E | KPMG to BST | E-mail: Subject: RE: Order xDSL via LENS | May 25, 2001 | 1 |
| 23 | May 22, 2001 | 17:40 E | KPMG to BST | E-mail: Subject: Centrex Order | May 25, 2001 | 3 |
| 24 | May 18, 2001 | 17:50 E | KPMG to BST | E-mail: Subject: TAG App Ids | May 23, 2001 | 3 |
| 25 | May 17, 2001 | 9:43 E | KPMG to BST | E-mail: Subject: RE: Ordering xDSL via LENS | May 17, 2001 | 0 |
| 26 | May 15, 2001 | 15:18 E | KPMG to BST | E-mail: Subject: RE: TAG API Training | May 15, 2001 | 0 |
| 27 | May 15, 2001 | 10:54 E | KPMG to BST | E-mail: Subject: Ordering xDSL via LENS | May 17, 2001 | 2 |
| 28 | May 10, 2001 | 14:33 E | KPMG to BST | E-mail: Subject: RE: TAG API Training | May 10, 2001 | 0 |
| 29 | May 4, 2001 | 10:30 E | KPMG to BST | E-mail: Subject: RE: OSDA Requests | May 4, 2001 | 0 |
| 30 | May 3, 2001 | 10:27 E | KPMG to BST | E-mail: Subject: LMU-SI Form | May 4, 2001 | 1 |
| 31 | May 1, 2001 | 8:51 E | KPMG to BST | E-mail: Subject: FW: OSDA/OLNS Requests | May 1, 2001 | 0 |
| 32 | April 26, 2001 | 14:15 E | KPMG to BST | E-mail: Subject: RE: OLNS | April 26, 2001 | 0 |
| 33 | April 20, 2001 | 14:09 E | KPMG to BST | E-mail: Subject: FW: TN Reservation | April 23, 2001 | 1 |
| 34 | April 19, 2001 | 9:59 E | KPMG to BST | E-mail: Subject: RE: TAG API Training | April 24, 2001 | 3 |
| 35 | April 18, 2001 | 14:28 E | KPMG to BST | E-Mail: Subject: OSDA/OLNS Requests | April 18, 2001 | 0 |
| 36 | April 18, 2001 | 13:10 E | KPMG to BST | E-Mail: Subject: FW: OSDA/OLNS Requests | May 1, 2001 | 9 |
| 37 | April 18, 2001 | 11:14 E | KPMG to BST | E-mail: Subject: RE: OLNS Request | April 18, 2001 | 0 |
| 38 | April 17, 2001 | 11:52 E | KPMG to BST | E-mail: Subject: FW: OSDA/OLNS Requests | April 18, 2001 | 1 |
| 39 | April 17, 2001 | 11:42 E | KPMG to BST | E-mail: Subject: RE: OSDA/OLNS Requests | April 18, 2001 | 1 |
| 40 | April 16, 2001 | 11:49 E | KPMG to BST | E-mail: Subject: RE: OSDA/OLNS Requests | April 18, 2001 | 2 |
| 41 | April 12, 2001 | 16:53 E | KPMG to BST | E-mail: Subject: FW: OSDA/OLNS Requests | April 16, 2001 | 2 |
| 42 | April 12, 2001 | 16:53 E | KPMG to BST | E-mail: Subject: FW: OSDA/OLNS Requests | April 16, 2001 | 2 |
| 43 | April 11, 2001 | 11:50 E | KPMG to BST | E-mail: Subject: FW: OSDA/OLNS Requests | April 11, 2001 | 0 |
| 44 | April 9, 2001 | 14:38 E | KPMG to BST | E-mail: Subject RE: OSDA/OLNS Requests | April 10, 2001 | 1 |
| 45 | April 9, 2001 | 12:51 E | KPMG to BST | E-mail: Subject: FW: TNs necessary for Centrex Orders | April 11, 2001 | 2 |
| 46 | April 4, 2001 | 15:42 E | KPMG to BST | E-mail: Subject: FW: OLNS | April 4, 2001 | 0 |
| 47 | April 3, 2001 | 17:03 E | KPMG to BST | E-mail: Subject: RE: DA-411 Code Conversion | April 4, 2001 | 1 |
| 48 | April 3, 2001 | 12:48 E | KPMG to BST | E-mail: Subject: RE: DA-411 Code Conversion | April 3, 2001 | 0 |

**KPMG Consulting / BellSouth – Account Management Communications
FLORIDA**

| | | | | | | |
|----|----------------|---------|-------------|---|----------------|---|
| 49 | April 2, 2001 | 14:43 E | KPMG to BST | E-mail: Subject: RE; TNs necessary for Centrex Orders | April 11, 2001 | 7 |
| 50 | April 2, 2001 | 13:31 E | KPMG to BST | E-mail: Subject: OLNS | April 4, 2001 | 2 |
| 51 | March 29, 2001 | 15:57 E | KPMG to BST | E-Mail: Subject: RE: TNs necessary for Centrex Orders | April 2, 2001 | 2 |
| 52 | March 29, 2001 | 9:10 E | KPMG to BST | E-mail: Subject: TNs necessary for Centrex Orders | March 29, 2001 | 0 |

OBSERVATION 115
BellSouth Florida OSS Testing Evaluation

Date August 31, 2001

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Documentation Review of the Account Establishment and Management Process (PPR-2).

Observation:

The BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes. (PPR2)

Background:

The BellSouth Account Team Procedures, Account Team Information Package states that the Account Team is required to respond to CLEC e-mail and telephone/voicemail inquiries within 24 hours¹.

Issue:

KPMG Consulting in its role as test CLEC, has relied on its assigned BellSouth Account Team to be the initial point of contact to successfully conduct business in the local service market. From March 29, 2001 to August 24, 2001, KPMG Consulting did not receive a response within 24 hours for 42% of the total inquiries made to the Account Team. KPMG Consulting would expect the BellSouth Account Team to follow the documented processes to ensure consistent performance. Attached is a summary of the inquiries KPMG Consulting made to the Account Team and the time it took to receive a response.

Impact:

The inability of the Account Team to consistently respond to CLEC inquiries within the specified timeframes negatively impacts a CLEC's ability to resolve customer issues and conduct business effectively.

¹ Account Team Procedures, Account Team Information Package, Version 7, Section 6.1, Page 16

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION115



Florida OSS Test
Observation 115

September 17, 2001

OBSERVATION REPORT

An observation has been identified as a result of test activities associated with the Documentation Review of the Account Establishment and Management Process (PPR-2).

Observation:

The BellSouth Account Team does not respond to CLEC inquiries within the documented customer contact timeframes. (PPR2)

Background:

The BellSouth Account Team Procedures, Account Team Information Package states that the Account Team is required to respond to CLEC e-mail and telephone/voicemail inquiries within 24 hours¹.

Issue:

KPMG Consulting in its role as test CLEC, has relied on its assigned BellSouth Account Team to be the initial point of contact to successfully conduct business in the local service market. From March 29, 2001 to August 24, 2001, KPMG Consulting did not receive a response within 24 hours for 42% of the total inquires made to the Account Team. KPMG Consulting would expect the BellSouth Account Team to follow the documented processes to ensure consistent performance. Attached is a summary of the inquiries KPMG Consulting made to the Account Team and the time it took to receive a response.

Impact:

The inability of the Account Team to consistently respond to CLEC inquiries within the specified timeframes negatively impacts a CLEC's ability to resolve customer issues and conduct business effectively.

BellSouth Response:

BellSouth agrees with KPMG's statement, "the inability of the Account Team to consistently respond to CLEC inquiries within the specified timeframes negatively

¹ Account Team Procedures, Account Team Information Package, Version 7, Section 6.1, Page 16

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION115

impacts a CLEC's ability to resolve customer issues and conduct business effectively." Therefore, the BellSouth Account Team discusses escalation procedures during its very first meeting with the CLEC. As described in chapter 5.0 of the Account Team Procedures, the escalation process is a standard agenda item at every introductory meeting. Within two days following the meeting, the Account Team provides the CLEC with a copy of the escalation contact list. BellSouth also maintains a current Account Team contact list on its Interconnection web site for easy reference. BellSouth expects that if a CLEC is dissatisfied with any aspect of Account Team support, that it will promptly communicate that concern to any Account Team member. If this does not resolve the issue, BellSouth expects that the CLEC will promptly invoke the escalation process. During the period of March 29th through August 24, 2001, BellSouth's Account Team and Account Team management received no communication from the KPMG CLEC regarding concerns with the timeliness of responses.

In addition to the escalation process, BellSouth offers the CLEC another opportunity to provide feedback on the Account Team. Chapter 12.0 of the Account Team Procedures states, "BellSouth's tool for analyzing the Account Team's responsiveness is the Personal Report Card." The report card is a survey that allows the CLEC to rate Account Team members on overall performance and support. There is a specific category entitled "accessibility and responsiveness," along with a place for narrative comments. When this report card was sent to three representatives of the KPMG CLEC, each declined to complete and return it. To date, the BellSouth Account Team, the Sales Director in particular, has no formalized or documented communication from KPMG concerning the issue raised in this observation.

BellSouth recognizes the critical role that the Account Team plays as the "initial point of contact to successfully conduct business in the local service market." Although it appears that the KPMG CLEC has not utilized the normal processes for addressing Account Team support issues, BellSouth has followed normal process in an effort to address the issue raised in this observation. In accordance with guidelines documented in chapter 12.0 of the Account Team Procedures, the Sales Director has coached the Account Team on providing timely responses to KPMG inquiries. Specifically, the Account Team has been reminded and instructed to return a response within 24 hours after receiving an email request from the CLEC. The KPMG CLEC should notice the improvement. If not, it should initiate an escalation, or other form of direct communication with the Account Team and the Account Team management. Finally, during the fourth quarter of this year, KPMG will have another opportunity to complete the Account Team report card.

EXCEPTION 158

BellSouth Florida OSS Testing Evaluation

Date: March 04, 2002

EXCEPTION REPORT

KPMG Consulting has identified an Exception as a result of the testing activities associated with the Provisioning Verification and Validation Evaluation test (TVV4).

Exception:

BellSouth's CLEC Line Loss Report does not update in a timely manner.

Background:

BellSouth uses Line Loss Reporting to inform Competitive Local Exchange Carriers (CLECs) that their customers' lines were terminated and/or migrated to their competitors.

BellSouth notifies CLECs of line loss by generating either a letter to the CLEC or a Line Loss report that the CLEC can access via the BellSouth Interconnection Services Daily Operational Reports Web Site. The BellSouth Line Loss Report includes the following account details: account telephone number, customer name, completion date, and post date.

Issue:

KPMG Consulting applies a success standard of 95%¹ when testing BellSouth's ability to update the CLEC Line Loss Report in a timely manner. The BellSouth Interconnection Services Daily Operational Reports Web Site states, "The Loss Notification report provides CLECs with a list of accounts lost the previous day." KPMG Consulting compared the service order completion date with the Line Loss Report post date for 455 entries on BellSouth's CLEC Line Loss Report. 323 lost accounts posted to the Line Loss Report one day after the service order completion date. Based on these findings, BellSouth posted 71% of the lost accounts in a timely manner. The discrepancies are detailed below.

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness |
|----|------------------|-----------|-----------------|-----------|------------|
| 1 | 407 298-1145 | DYW9Q106 | 12/21/01 | 12/12/01 | -8 |
| 2 | 407 425-9850 | DY36QYQ1 | 12/21/01 | 12/19/01 | -1 |
| 3 | 407 240-1072 | DY5Q6RY2 | 12/18/01 | 12/20/01 | 2 |
| 4 | 407 251-9369 | DY853LP9 | 12/17/01 | 12/19/01 | 2 |
| 5 | 407 273-1460 | DY0JF7W4 | 12/20/01 | 12/22/01 | 2 |
| 6 | 407 273-8699 | DY83L1T8 | 12/18/01 | 12/20/01 | 2 |
| 7 | 407 290-1144 | DY50H7B1 | 12/20/01 | 12/22/01 | 2 |
| 8 | 407 291-4973 | DY9D3B11 | 12/19/01 | 12/21/01 | 2 |
| 9 | 407 293-2666 | DY252CQ2 | 12/19/01 | 12/21/01 | 2 |
| 10 | 407 295-5577 | DY22M5F7 | 12/18/01 | 12/20/01 | 2 |

¹ KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC-approved standards or 2) documented BellSouth guidelines.

EXCEPTION 158

BellSouth Florida OSS Testing Evaluation

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness |
|----|------------------|-----------|-----------------|-----------|------------|
| 11 | 407 295-5960 | DY3VCHC5 | 12/19/01 | 12/21/01 | 2 |
| 12 | 407 295-4687 | DY4F4HY4 | 12/18/01 | 12/20/01 | 2 |
| 13 | 407 296-9250 | DY2B9CJ2 | 12/17/01 | 12/19/01 | 2 |
| 14 | 407 297-6167 | DY6MVFD3 | 12/17/01 | 12/19/01 | 2 |
| 15 | 407 297-6397 | DY8B39Y2 | 12/20/01 | 12/22/01 | 2 |
| 16 | 407 298-0506 | DY0VYYM2 | 12/19/01 | 12/21/01 | 2 |
| 17 | 407 298-1511 | DY22DK83 | 12/17/01 | 12/19/01 | 2 |
| 18 | 407 298-0912 | DY6XQJR4 | 12/17/01 | 12/19/01 | 2 |
| 19 | 407 299-2648 | CY9B7309 | 12/18/01 | 12/20/01 | 2 |
| 20 | 407 299-4751 | DY45YWC2 | 12/17/01 | 12/19/01 | 2 |
| 21 | 407 351-5993 | DY67LG76 | 12/20/01 | 12/22/01 | 2 |
| 22 | 407 363-1688 | DY0XWRH3 | 12/17/01 | 12/19/01 | 2 |
| 23 | 407 426-0505 | DY3Y8494 | 12/20/01 | 12/22/01 | 2 |
| 24 | 407 438-2666 | DY8TJBJ2 | 12/17/01 | 12/19/01 | 2 |
| 25 | 407 438-5677 | DY9NHT11 | 12/20/01 | 12/22/01 | 2 |
| 26 | 407 523-5917 | DY33N0F1 | 12/19/01 | 12/21/01 | 2 |
| 27 | 407 523-9740 | DY6QNMM0 | 12/19/01 | 12/21/01 | 2 |
| 28 | 407 532-0255 | DY02GX61 | 12/19/01 | 12/21/01 | 2 |
| 29 | 407 578-8947 | DY0DQ5F0 | 12/19/01 | 12/21/01 | 2 |
| 30 | 407 578-6749 | DY2N4235 | 12/19/01 | 12/21/01 | 2 |
| 31 | 407 648-4623 | DY6DJ3P8 | 12/20/01 | 12/22/01 | 2 |
| 32 | 407 822-0490 | DYB63625 | 12/20/01 | 12/22/01 | 2 |
| 33 | 407 850-4300 | DY5HG0G0 | 12/20/01 | 12/22/01 | 2 |
| 34 | 407 850-9988 | DY6B7GJ3 | 12/18/01 | 12/20/01 | 2 |
| 35 | 407 851-5910 | DY384QT9 | 12/17/01 | 12/19/01 | 2 |
| 36 | 407 851-4252 | DY6MNDL9 | 12/17/01 | 12/19/01 | 2 |
| 37 | 407 855-9155 | DY145JC1 | 12/20/01 | 12/22/01 | 2 |
| 38 | 407 855-3282 | DY69QG52 | 12/18/01 | 12/20/01 | 2 |
| 39 | 407 855-7786 | DY6Q3654 | 12/20/01 | 12/22/01 | 2 |
| 40 | 407 856-0016 | DY6K3J46 | 12/19/01 | 12/21/01 | 2 |
| 41 | 407 856-2525 | DY990FX4 | 12/18/01 | 12/20/01 | 2 |
| 42 | 407 857-0292 | DY2G6222 | 12/17/01 | 12/19/01 | 2 |
| 43 | 407 872-8523 | DY6XKN24 | 12/20/01 | 12/22/01 | 2 |
| 44 | 407 894-8181 | DY1DKCK6 | 12/18/01 | 12/20/01 | 2 |
| 45 | 407 895-1812 | DY7TDYL1 | 12/20/01 | 12/22/01 | 2 |
| 46 | 407 M27-2545 | DY4HBC57 | 12/17/01 | 12/19/01 | 2 |
| 47 | 904 268-3775 | DY2LF7D2 | 12/18/01 | 12/20/01 | 2 |
| 48 | 904 268-0134 | DY3BMB20 | 12/20/01 | 12/22/01 | 2 |
| 49 | 904 268-7995 | DY49TW21 | 12/18/01 | 12/20/01 | 2 |
| 50 | 904 268-5088 | DY8YD5X6 | 12/18/01 | 12/20/01 | 2 |
| 51 | 904 288-9291 | DY9X1QC2 | 12/18/01 | 12/20/01 | 2 |
| 52 | 904 292-1340 | DY6851F9 | 12/18/01 | 12/20/01 | 2 |
| 53 | 904 292-1411 | DY90DRL8 | 12/18/01 | 12/20/01 | 2 |

EXCEPTION 158

BellSouth Florida OSS Testing Evaluation

| | Account Tel No | Order No | Completion Date | Post Date | Timeliness |
|----|----------------|----------|-----------------|-----------|------------|
| 54 | 904 353-1234 | DY14BDQ1 | 12/20/01 | 12/22/01 | 2 |
| 55 | 904 354-6032 | DY8F5L08 | 12/17/01 | 12/19/01 | 2 |
| 56 | 904 730-7120 | DY1PFD87 | 12/20/01 | 12/22/01 | 2 |
| 57 | 904 786-6572 | DY95H050 | 12/17/01 | 12/19/01 | 2 |
| 58 | 904 940-9940 | CYBMRQK1 | 12/20/01 | 12/22/01 | 2 |
| 59 | 904 M52-5701 | DY1X6K74 | 12/19/01 | 12/21/01 | 2 |
| 60 | 904 M52-4056 | DY33LMW5 | 12/19/01 | 12/21/01 | 2 |
| 61 | 407 240-6668 | DYC7G0C9 | 12/20/01 | 12/22/01 | 2 |
| 62 | 407 240-1967 | DYFQ3KK6 | 12/20/01 | 12/22/01 | 2 |
| 63 | 407 290-0309 | DYBGQ9C8 | 12/17/01 | 12/19/01 | 2 |
| 64 | 407 291-6676 | DYBNWJB8 | 12/17/01 | 12/19/01 | 2 |
| 65 | 407 291-2749 | DYDRGQ47 | 12/20/01 | 12/22/01 | 2 |
| 66 | 407 293-5339 | DYB8L2D8 | 12/19/01 | 12/21/01 | 2 |
| 67 | 407 295-6211 | DYFPT9V0 | 12/17/01 | 12/19/01 | 2 |
| 68 | 407 296-7131 | DYG88QG2 | 12/19/01 | 12/21/01 | 2 |
| 69 | 407 297-7735 | DYFFB743 | 12/20/01 | 12/22/01 | 2 |
| 70 | 407 297-6324 | DYFP19V3 | 12/17/01 | 12/19/01 | 2 |
| 71 | 407 299-7698 | DYBF77P6 | 12/18/01 | 12/20/01 | 2 |
| 72 | 407 351-1521 | DYLG5173 | 12/17/01 | 12/19/01 | 2 |
| 73 | 407 363-0365 | DYBJY4G2 | 12/20/01 | 12/22/01 | 2 |
| 74 | 407 438-7916 | DYDX76L6 | 12/17/01 | 12/19/01 | 2 |
| 75 | 407 578-1132 | DYCY1DN6 | 12/18/01 | 12/20/01 | 2 |
| 76 | 407 578-5728 | DYF6X7Y7 | 12/18/01 | 12/20/01 | 2 |
| 77 | 407 841-5544 | DYFKC100 | 12/20/01 | 12/22/01 | 2 |
| 78 | 407 854-7196 | DYBQ2488 | 12/20/01 | 12/22/01 | 2 |
| 79 | 407 855-5499 | DYG8NXH8 | 12/17/01 | 12/19/01 | 2 |
| 80 | 407 855-3281 | DYGD9J12 | 12/18/01 | 12/20/01 | 2 |
| 81 | 407 856-4044 | DYF1MYF2 | 12/17/01 | 12/19/01 | 2 |
| 82 | 407 857-8296 | DYB7LY01 | 12/18/01 | 12/20/01 | 2 |
| 83 | 904 268-2228 | DYGC36D8 | 12/20/01 | 12/22/01 | 2 |
| 84 | 904 272-7926 | DYNPY502 | 12/18/01 | 12/20/01 | 2 |
| 85 | 904 353-4500 | DYG31RF8 | 12/17/01 | 12/19/01 | 2 |
| 86 | 904 695-2010 | DYG5NHN0 | 12/17/01 | 12/19/01 | 2 |
| 87 | 407 240-6668 | DYC7G0C9 | 12/20/01 | 12/22/01 | 2 |
| 88 | 407 290-0309 | DYBGQ9C8 | 12/17/01 | 12/19/01 | 2 |
| 89 | 407 291-6676 | DYBNWJB8 | 12/17/01 | 12/19/01 | 2 |
| 90 | 407 291-2749 | DYDRGQ47 | 12/20/01 | 12/22/01 | 2 |
| 91 | 407 293-5339 | DYB8L2D8 | 12/19/01 | 12/21/01 | 2 |
| 92 | 407 295-6211 | DYFPT9V0 | 12/17/01 | 12/19/01 | 2 |
| 93 | 407 296-7131 | DYG88QG2 | 12/19/01 | 12/21/01 | 2 |
| 94 | 407 297-7735 | DYFFB743 | 12/20/01 | 12/22/01 | 2 |
| 95 | 407 297-6324 | DYFP19V3 | 12/17/01 | 12/19/01 | 2 |
| 96 | 407 299-7698 | DYBF77P6 | 12/18/01 | 12/20/01 | 2 |

EXCEPTION 158

BellSouth Florida OSS Testing Evaluation

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness |
|-----|------------------|-----------|-----------------|-----------|------------|
| 97 | 407 351-1521 | DYLG5173 | 12/17/01 | 12/19/01 | 2 |
| 98 | 407 363-0365 | DYBJY4G2 | 12/20/01 | 12/22/01 | 2 |
| 99 | 407 438-7916 | DYDX76L6 | 12/17/01 | 12/19/01 | 2 |
| 100 | 407 578-1132 | DYCY1DN6 | 12/18/01 | 12/20/01 | 2 |
| 101 | 407 578-5728 | DYF6X7Y7 | 12/18/01 | 12/20/01 | 2 |
| 102 | 407 841-5544 | DYFKC100 | 12/20/01 | 12/22/01 | 2 |
| 103 | 407 854-7196 | DYBQ2488 | 12/20/01 | 12/22/01 | 2 |
| 104 | 407 855-5499 | DYG8NXH8 | 12/17/01 | 12/19/01 | 2 |
| 105 | 407 855-3281 | DYGD9J12 | 12/18/01 | 12/20/01 | 2 |
| 106 | 407 856-4044 | DYF1MYF2 | 12/17/01 | 12/19/01 | 2 |
| 107 | 407 857-8296 | DYB7LY01 | 12/18/01 | 12/20/01 | 2 |
| 108 | 407 248-8887 | DY56QG01 | 12/17/01 | 12/20/01 | 3 |
| 109 | 904 268-3817 | DY64D4N2 | 12/17/01 | 12/20/01 | 3 |
| 110 | 904 288-9530 | DY4MMT06 | 12/17/01 | 12/20/01 | 3 |
| 111 | 904 292-4403 | DY3P9X19 | 12/17/01 | 12/20/01 | 3 |
| 112 | 904 292-0339 | DY8QNRN5 | 12/17/01 | 12/20/01 | 3 |
| 113 | 904 880-7068 | DY0Y86K1 | 12/17/01 | 12/20/01 | 3 |
| 114 | 904 880-8980 | DY4R1JR9 | 12/17/01 | 12/20/01 | 3 |
| 115 | 904 880-3818 | DY92TRH3 | 12/17/01 | 12/20/01 | 3 |
| 116 | 904 268-3473 | DYCHMQG1 | 12/17/01 | 12/20/01 | 3 |
| 117 | 904 292-9919 | DYCDXTK7 | 12/17/01 | 12/20/01 | 3 |
| 118 | 407 299-2718 | DY16DYV6 | 12/18/01 | 12/22/01 | 4 |
| 119 | 407 351-1411 | DY4RNC19 | 12/17/01 | 12/21/01 | 4 |
| 120 | 407 363-7286 | DY0ML2K6 | 12/17/01 | 12/21/01 | 4 |
| 121 | 407 363-6889 | DY30YRK7 | 12/17/01 | 12/21/01 | 4 |
| 122 | 407 363-4400 | DY6NQ3J1 | 12/17/01 | 12/21/01 | 4 |
| 123 | 407 363-2820 | DY88CT12 | 12/17/01 | 12/21/01 | 4 |
| 124 | 407 370-0663 | DY2BH250 | 12/17/01 | 12/21/01 | 4 |
| 125 | 407 851-1756 | DY6N91T4 | 12/21/01 | 12/25/01 | 4 |
| 126 | 407 351-3481 | DYBMYYP0 | 12/17/01 | 12/21/01 | 4 |
| 127 | 407 351-3481 | DYBMYYP0 | 12/17/01 | 12/21/01 | 4 |
| 128 | 407 855-6321 | DY01P101 | 12/20/01 | 12/25/01 | 5 |
| 129 | 407 275-5959 | DY0LTN02 | 12/21/01 | 12/27/01 | 6 |
| 130 | 407 324-5887 | CYD107T0 | 12/18/01 | 12/25/01 | 7 |
| 131 | 407 851-1756 | DY03F5D9 | 12/17/01 | 12/25/01 | 8 |
| 132 | 407 522-5209 | DY09B2G5 | 12/17/01 | 12/25/01 | 8 |

Impact:

CLECs rely on timely line loss reports to manage customer billing and marketing activities. The lack of timely Line Loss Reports may result in decreased customer satisfaction and could impact CLEC business operations.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 158



Florida OSS Test
Exception 158

March 20, 2002

EXCEPTION REPORT

KPMG Consulting has identified an Exception as a result of the testing activities associated with the Provisioning Verification and Validation Evaluation test (TVV4).

Exception:

BellSouth's CLEC Line Loss Report does not update in a timely manner.

Background:

BellSouth uses Line Loss Reporting to inform Competitive Local Exchange Carriers (CLECs) that their customers' lines were terminated and/or migrated to their competitors.

BellSouth notifies CLECs of line loss by generating either a letter to the CLEC or a Line Loss report that the CLEC can access via the BellSouth Interconnection Services Daily Operational Reports Web Site. The BellSouth Line Loss Report includes the following account details: account telephone number, customer name, completion date, and post date.

Issue:

KPMG Consulting applies a success standard of 95%¹ when testing BellSouth's ability to update the CLEC Line Loss Report in a timely manner. The BellSouth Interconnection Services Daily Operational Reports Web Site states, "The Loss Notification report provides CLECs with a list of accounts lost the previous day." KPMG Consulting compared the service order completion date with the Line Loss Report post date for 455 entries on BellSouth's CLEC Line Loss Report. 323 lost accounts posted to the Line Loss Report one day after the service order completion date. Based on these findings, BellSouth posted 71% of the lost accounts in a timely manner. The discrepancies are detailed below.

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|---|------------------|-----------|-----------------|-----------|------------|---|
| 1 | 407 298-1145 | DYW9Q106 | 12/21/01 | 12/12/01 | -8 | Do Not Agree. Incorrect order number and dates shown. This order was a line loss for a retail account. The order was issued 12/19/01 and completed on 12/21/01. DY868MP4 was the order for the CLEC line loss account that was issued 11/13/01 and completed on |

¹ KPMG Consulting applied standards based on its professional judgment in the absence of 1) FPSC - approved standards or 2) documented BellSouth guide lines.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|----|------------------|-----------|-----------------|-----------|------------|---|
| | | | | | | 12/11/01. |
| 2 | 407 425-9850 | DY36QYQ1 | 12/21/01 | 12/19/01 | -1 | Do Not Agree. Incorrect dates shown for order number. DYFBKTQ0 was issued 12/14/01 with completion date of 12/18/01 and DCR CC. NY24C7D2 was issued 12/14/01 with completion date of 12/18/01 to handle conversion. A second disconnect order, DY36QYQ1, was issued 12/20/01 with a completion date of 12/21/01 and DCR NF. |
| 3 | 407 240-1072 | DY5Q6RY2 | 12/18/01 | 12/20/01 | 2 | Agree |
| 4 | 407 251-9369 | DY853LP9 | 12/17/01 | 12/19/01 | 2 | Agree |
| 5 | 407 273-1460 | DY0JF7W4 | 12/20/01 | 12/22/01 | 2 | Agree |
| 6 | 407 273-8699 | DY83L1T8 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 7 | 407 290-1144 | DY50H7B1 | 12/20/01 | 12/22/01 | 2 | Agree |
| 8 | 407 291-4973 | DY9D3B11 | 12/19/01 | 12/21/01 | 2 | Agree |
| 9 | 407 293-2666 | DY252CQ2 | 12/19/01 | 12/21/01 | 2 | Agree |
| 10 | 407 295-5577 | DY22M5F7 | 12/18/01 | 12/20/01 | 2 | Agree |
| 11 | 407 295-5960 | DY3VCHC5 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 12 | 407 295-4687 | DY4F4HY4 | 12/18/01 | 12/20/01 | 2 | Agree |
| 13 | 407 296-9250 | DY2B9CJ2 | 12/17/01 | 12/19/01 | 2 | Agree |
| 14 | 407 297-6167 | DY6MVFD3 | 12/17/01 | 12/19/01 | 2 | Agree |
| 15 | 407 297-6397 | DY8B39Y2 | 12/20/01 | 12/22/01 | 2 | Agree |
| 16 | 407 298-0506 | DY0VYYM2 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 17 | 407 298-1511 | DY22DK83 | 12/17/01 | 12/19/01 | 2 | Agree |
| 18 | 407 298-0912 | DY6XQJR4 | 12/17/01 | 12/19/01 | 2 | Agree |
| 19 | 407 299-2648 | CY9B7309 | 12/18/01 | 12/20/01 | 2 | Agree |

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|----|------------------|-----------|-----------------|-----------|------------|--|
| 20 | 407 299-4751 | DY45YWC2 | 12/17/01 | 12/19/01 | 2 | Agree |
| 21 | 407 351-5993 | DY67LG76 | 12/20/01 | 12/22/01 | 2 | Agree |
| 22 | 407 363-1688 | DY0XWRH3 | 12/17/01 | 12/19/01 | 2 | Agree |
| 23 | 407 426-0505 | DY3Y8494 | 12/20/01 | 12/22/01 | 2 | Agree |
| 24 | 407 438-2666 | DY8TJB2 | 12/17/01 | 12/19/01 | 2 | Agree |
| 25 | 407 438-5677 | DY9NHT11 | 12/20/01 | 12/22/01 | 2 | Agree |
| 26 | 407 523-5917 | DY33N0F1 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 27 | 407 523-9740 | DY6QNMM0 | 12/19/01 | 12/21/01 | 2 | Agree |
| 28 | 407 532-0255 | DY02GX61 | 12/19/01 | 12/21/01 | 2 | Agree |
| 29 | 407 578-8947 | DY0DQ5F0 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 30 | 407 578-6749 | DY2N4235 | 12/19/01 | 12/21/01 | 2 | Agree |
| 31 | 407 648-4623 | DY6DJ3P8 | 12/20/01 | 12/22/01 | 2 | Agree |
| 32 | 407 822-0490 | DYB63625 | 12/20/01 | 12/22/01 | 2 | Agree |
| 33 | 407 850-4300 | DY5HG0G0 | 12/20/01 | 12/22/01 | 2 | Agree |
| 34 | 407 850-9988 | DY6B7GJ3 | 12/18/01 | 12/20/01 | 2 | Agree |
| 35 | 407 851-5910 | DY384QT9 | 12/17/01 | 12/19/01 | 2 | Agree |
| 36 | 407 851-4252 | DY6MNDL9 | 12/17/01 | 12/19/01 | 2 | Agree |
| 37 | 407 855-9155 | DY145JC1 | 12/20/01 | 12/22/01 | 2 | Agree |
| 38 | 407 855-3282 | DY69QG52 | 12/18/01 | 12/20/01 | 2 | Agree |
| 39 | 407 855-7786 | DY6Q3654 | 12/20/01 | 12/22/01 | 2 | Agree |
| 40 | 407 856-0016 | DY6K3J46 | 12/19/01 | 12/21/01 | 2 | Agree |
| 41 | 407 856-2525 | DY990FX4 | 12/18/01 | 12/20/01 | 2 | Agree |
| 42 | 407 857-0292 | DY2G6222 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 43 | 407 872-8523 | DY6XKN24 | 12/20/01 | 12/22/01 | 2 | Agree |

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|----|------------------|-----------|-----------------|-----------|------------|--|
| 44 | 407 894-8181 | DY1DKCK6 | 12/18/01 | 12/20/01 | 2 | Agree |
| 45 | 407 895-1812 | DY7TDYL1 | 12/20/01 | 12/22/01 | 2 | Agree |
| 46 | 407 M27-2545 | DY4HBC57 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed per Disconnect process work instructions on 12/18/01. |
| 47 | 904 268-3775 | DY2LF7D2 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 48 | 904 268-0134 | DY3BMB20 | 12/20/01 | 12/22/01 | 2 | Agree |
| 49 | 904 268-7995 | DY49TW21 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 50 | 904 268-5088 | DY8YD5X6 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 51 | 904 288-9291 | DY9X1QC2 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 52 | 904 292-1340 | DY6851F9 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 53 | 904 292-1411 | DY90DRL8 | 12/18/01 | 12/20/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 54 | 904 353-1234 | DY14BDQ1 | 12/20/01 | 12/22/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/19/01. |
| 55 | 904 354-6032 | DY8F5L08 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 56 | 904 730-7120 | DY1PFD87 | 12/20/01 | 12/22/01 | 2 | Agree |
| 57 | 904 786-6572 | DY95H050 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 58 | 904 940-9940 | CYBMRQK1 | 12/20/01 | 12/22/01 | 2 | Do Not Agree. This was a retail coin account conversion to a reseller. |
| 59 | 904 M52-5701 | DY1X6K74 | 12/19/01 | 12/21/01 | 2 | Agree |

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|----|------------------|-----------|-----------------|-----------|------------|--|
| 60 | 904 M52-4056 | DY33LMW5 | 12/19/01 | 12/21/01 | 2 | Agree |
| 61 | 407 240-6668 | DYC7G0C9 | 12/20/01 | 12/22/01 | 2 | Agree |
| 62 | 407 240-1967 | DYFQ3KK6 | 12/20/01 | 12/22/01 | 2 | Agree |
| 63 | 407 290-0309 | DYBGQ9C8 | 12/17/01 | 12/19/01 | 2 | Agree |
| 64 | 407 291-6676 | DYBNWJB8 | 12/17/01 | 12/19/01 | 2 | Agree |
| 65 | 407 291-2749 | DYDRGQ47 | 12/20/01 | 12/22/01 | 2 | Agree |
| 66 | 407 293-5339 | DYB8L2D8 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 67 | 407 295-6211 | DYFPT9V0 | 12/17/01 | 12/19/01 | 2 | Agree |
| 68 | 407 296-7131 | DYG88QG2 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 69 | 407 297-7735 | DYFFB743 | 12/20/01 | 12/22/01 | 2 | Agree |
| 70 | 407 297-6324 | DYFP19V3 | 12/17/01 | 12/19/01 | 2 | Agree |
| 71 | 407 299-7698 | DYBF77P6 | 12/18/01 | 12/20/01 | 2 | Agree |
| 72 | 407 351-1521 | DYLG5173 | 12/17/01 | 12/19/01 | 2 | Agree |
| 73 | 407 363-0365 | DYBJY4G2 | 12/20/01 | 12/22/01 | 2 | Agree |
| 74 | 407 438-7916 | DYDX76L6 | 12/17/01 | 12/19/01 | 2 | Agree |
| 75 | 407 578-1132 | DYCY1DN6 | 12/18/01 | 12/20/01 | 2 | Agree |
| 76 | 407 578-5728 | DYF6X7Y7 | 12/18/01 | 12/20/01 | 2 | Agree |
| 77 | 407 841-5544 | DYFKC100 | 12/20/01 | 12/22/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/21/01. |
| 78 | 407 854-7196 | DYBQ2488 | 12/20/01 | 12/22/01 | 2 | Agree |
| 79 | 407 855-5499 | DYG8NXH8 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 80 | 407 855-3281 | DYGD9J12 | 12/18/01 | 12/20/01 | 2 | Agree |
| 81 | 407 856-4044 | DYF1MYF2 | 12/17/01 | 12/19/01 | 2 | Agree |

FLORIDA OSS BELL SOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|-----|------------------|-----------|-----------------|-----------|------------|--|
| 82 | 407 857-8296 | DYB7LY01 | 12/18/01 | 12/20/01 | 2 | Agree |
| 83 | 904 268-2228 | DYGC36D8 | 12/20/01 | 12/22/01 | 2 | Agree |
| 84 | 904 272-7926 | DYNPY502 | 12/18/01 | 12/20/01 | 2 | Agree |
| 85 | 904 353-4500 | DYG31RF8 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 86 | 904 695-2010 | DYG5NHN0 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 87 | 407 240-6668 | DYC7G0C9 | 12/20/01 | 12/22/01 | 2 | Agree |
| 88 | 407 290-0309 | DYBGQ9C8 | 12/17/01 | 12/19/01 | 2 | Agree |
| 89 | 407 291-6676 | DYBNWJB8 | 12/17/01 | 12/19/01 | 2 | Agree |
| 90 | 407 291-2749 | DYDRGQ47 | 12/20/01 | 12/22/01 | 2 | Agree |
| 91 | 407 293-5339 | DYB8L2D8 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 92 | 407 295-6211 | DYFPT9V0 | 12/17/01 | 12/19/01 | 2 | Agree |
| 93 | 407 296-7131 | DYG88QG2 | 12/19/01 | 12/21/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/20/01. |
| 94 | 407 297-7735 | DYFFB743 | 12/20/01 | 12/22/01 | 2 | Agree |
| 95 | 407 297-6324 | DYFP19V3 | 12/17/01 | 12/19/01 | 2 | Agree |
| 96 | 407 299-7698 | DYBF77P6 | 12/18/01 | 12/20/01 | 2 | Agree |
| 97 | 407 351-1521 | DYLG5173 | 12/17/01 | 12/19/01 | 2 | Agree |
| 98 | 407 363-0365 | DYBJY4G2 | 12/20/01 | 12/22/01 | 2 | Agree |
| 99 | 407 438-7916 | DYDX76L6 | 12/17/01 | 12/19/01 | 2 | Agree |
| 100 | 407 578-1132 | DYCY1DN6 | 12/18/01 | 12/20/01 | 2 | Agree |
| 101 | 407 578-5728 | DYF6X7Y7 | 12/18/01 | 12/20/01 | 2 | Agree |
| 102 | 407 841-5544 | DYFKC100 | 12/20/01 | 12/22/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/21/01. |
| 103 | 407 854-7196 | DYBQ2488 | 12/20/01 | 12/22/01 | 2 | Agree |

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 158

| | Account/Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|-----|------------------|-----------|-----------------|-----------|------------|--|
| 104 | 407 855-5499 | DYG8NXH8 | 12/17/01 | 12/19/01 | 2 | Do Not Agree Order was completed by default acceptance policy and closed out on DD+1 on 12/18/01. |
| 105 | 407 855-3281 | DYGD9J12 | 12/18/01 | 12/20/01 | 2 | Agree |
| 106 | 407 856-4044 | DYF1MYF2 | 12/17/01 | 12/19/01 | 2 | Agree |
| 107 | 407 857-8296 | DYB7LY01 | 12/18/01 | 12/20/01 | 2 | Agree |
| 108 | 407 248-8887 | DY56QG01 | 12/17/01 | 12/20/01 | 3 | Agree |
| 109 | 904 268-3817 | DY64D4N2 | 12/17/01 | 12/20/01 | 3 | Agree |
| 110 | 904 288-9530 | DY4MMT06 | 12/17/01 | 12/20/01 | 3 | Agree |
| 111 | 904 292-4403 | DY3P9X19 | 12/17/01 | 12/20/01 | 3 | Agree |
| 112 | 904 292-0339 | DY8QNRN5 | 12/17/01 | 12/20/01 | 3 | Agree |
| 113 | 904 880-7068 | DY0Y86K1 | 12/17/01 | 12/20/01 | 3 | Agree |
| 114 | 904 880-8980 | DY4R1JR9 | 12/17/01 | 12/20/01 | 3 | Agree |
| 115 | 904 880-3818 | DY92TRH3 | 12/17/01 | 12/20/01 | 3 | Agree |
| 116 | 904 268-3473 | DYCHMQG1 | 12/17/01 | 12/20/01 | 3 | Agree |
| 117 | 904 292-9919 | DYCDXTK7 | 12/17/01 | 12/20/01 | 3 | Agree |
| 118 | 407 299-2718 | DY16DYV6 | 12/18/01 | 12/22/01 | 4 | Agree |
| 119 | 407 351-1411 | DY4RNC19 | 12/17/01 | 12/21/01 | 4 | Agree |
| 120 | 407 363-7286 | DY0ML2K6 | 12/17/01 | 12/21/01 | 4 | Agree |
| 121 | 407 363-6889 | DY30YRK7 | 12/17/01 | 12/21/01 | 4 | Agree |
| 122 | 407 363-4400 | DY6NQ3J1 | 12/17/01 | 12/21/01 | 4 | Agree |
| 123 | 407 363-2820 | DY88CT12 | 12/17/01 | 12/21/01 | 4 | Agree |
| 124 | 407 370-0663 | DY2BH250 | 12/17/01 | 12/21/01 | 4 | Agree |
| 125 | 407 851-1756 | DY6N91T4 | 12/21/01 | 12/25/01 | 4 | Agree |
| 126 | 407 351-3481 | DYBMYYP0 | 12/17/01 | 12/21/01 | 4 | Agree |
| 127 | 407 351-3481 | DYBMYYP0 | 12/17/01 | 12/21/01 | 4 | Do Not Agree. DUPLICATE of Item 126 |
| 128 | 407 855-6321 | DY01P101 | 12/20/01 | 12/25/01 | 5 | Agree |

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 158

| | Account Tel. No. | Order No. | Completion Date | Post Date | Timeliness | BellSouth's Findings |
|-----|------------------|-----------|-----------------|-----------|------------|--|
| 129 | 407 275-5959 | DY0LTN02 | 12/21/01 | 12/27/01 | 6 | Agree |
| 130 | 407 324-5887 | CYD107T0 | 12/18/01 | 12/25/01 | 7 | Do Not Agree. Incorrect order number and dates shown. CYD107T0 is a retail line loss order that completed 12/18/01. DYG65WN5 was the CLEC line loss order that was completed 12/24/01. |
| 131 | 407 851-1756 | DY03F5D9 | 12/17/01 | 12/25/01 | 8 | Agree |
| 132 | 407 522-5209 | DY09B2G5 | 12/17/01 | 12/25/01 | 8 | Do Not Agree Incorrect order number and dates shown. This order, DY09B2G5, was a retail line loss order that completed 12/17/01. DY8BQTV9 was the CLEC line loss order that was completed 12/24/01. |

Impact:

CLECs rely on timely line loss reports to manage customer billing and marketing activities. The lack of timely Line Loss Reports may result in decreased customer satisfaction and could impact CLEC business operations.

BellSouth Response:

BellSouth's findings are included in the chart above. BellSouth agrees with 99 of the 132 PONS submitted. Data extracted for the Line Loss Report excludes service orders that on occasion contain errors that require resolution prior to updating to the Customer Service Record (CSR) for billing. Additionally, if the service order completes after the daily extract for the Line Loss Report is completed, the lines will appear on the following day's report. There were some delays in the completions due to CWINS Center employee errors. The affected employees have been covered, and will receive ongoing coaching and development.

The vast majority of service orders post for billing in less than three (3) days after completion. BellSouth will implement a change to the web-based Line Loss Report on March 23, 2002 indicating that the report will reflect telephone numbers that qualify for line loss notification after the provisioning and ordering processes have been completed. Listed below is a summary of the issues found.

FLORIDA OSS BELLSOUTH'S RESPONSE TO EXCEPTION 158

Summary of Issues Found:

| | Issue | Agree | No. of Items | Item Numbers |
|---|---|-----------|--------------|--|
| 1 | KPMG provided incorrect dates/order numbers. | | 5 | 1, 2, 58, 130, 132 |
| 2 | UNE orders that are handled by the CWINS Center follow an acceptance policy to hold completed orders until DD+1 when requested by the CLEC or by default on conversion and disconnect orders. | | 26 | 6, 11, 16, 26, 29, 42, 46, 47, 49, 50, 51, 52, 53, 54, 55, 57, 66, 68, 77, 79, 85, 86, 91, 93, 102, 104, |
| 3 | Duplicate Item | | 1 | 127 |
| 4 | Agree with KPMG | 99 | | All other Items. |
| | Total | 99 | 32 | 132 |

OBSERVATION 165

BellSouth Florida QSS Testing Evaluation

Date: February 18, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Account Establishment and Management Review (PPR2)

Observation:

BellSouth's Account Team/CLEC Care Team Procedures¹ documentation is unclear. (PPR2)

Background:

On January 4, 2002, BellSouth Issued Carrier Notification SN91082802 detailing how the "BellSouth Interconnection Services' (ICS) Sales Organization will roll out a functional structure that focuses on Strategic Product Sales and Local Service Support". BellSouth formed two groups to support CLECs, the Account Team and the CLEC Care Team. According to BellSouth, the Account Team will support customers who purchase Premium and Complex Resale products and will have a sales focus. The CLEC Care Team will support CLECs who purchase Unbundled Network Elements (UNEs) and Simple Resale local services.

Issue:

KPMG Consulting reviewed BellSouth's Account Team/CLEC Care Team Procedures documentation and found the following issues:

1. The document contains multiple references to "Account Team/CLEC Care Team" and "Sales/Sales Support Directors" which can imply both groups are responsible for performing the same functions. This is inconsistent with KPMG Consulting's understanding of the new Account Team/CLEC Care Team structure.
2. The document states that the Account Team/CLEC Care Team "serves as the single point of contact for all pre-order needs," however it does not address ordering or post-ordering needs (e.g. Management of PMAP and Billing issues).
3. The document does not define Premium and Complex Resale Services supported by the Account Team.
4. The document states: "The criterion for a wholesale customer to have an assigned LSM (Local Support Manager) is annual revenue for BellSouth in

¹ Account Team/CLEC Care Team Procedures, Account Team/CLEC Care Team Information Package, Version 9, January 30, 2002.

OBSERVATION 165
BellSouth Florida OSS Testing Evaluation

UNE and simple resale product,” however no annual revenue target is provided.

Impact:

Without well-defined, documented procedures, it is difficult to determine which activities the Account Team should execute and which should be executed by the CLEC Care Team. This issue could result in the inconsistent management of CLEC issues and adversely impact the CLEC’s ability to conduct business.

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 165



Florida OSS Test
Observation 165

March 7, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Account Establishment and Management Review (PPR2)

Observation:

BellSouth's Account Team/CLEC Care Team Procedures¹ documentation is unclear. (PPR2)

Background:

On January 4, 2002, BellSouth Issued Carrier Notification SN91082802 detailing how the "BellSouth Interconnection Services' (ICS) Sales Organization will roll out a functional structure that focuses on Strategic Product Sales and Local Service Support". BellSouth formed two groups to support CLECs, the Account Team and the CLEC Care Team. According to BellSouth, the Account Team will support customers who purchase Premium and Complex Resale products and will have a sales focus. The CLEC Care Team will support CLECs who purchase Unbundled Network Elements (UNEs) and Simple Resale local services.

Issue:

KPMG Consulting reviewed BellSouth's Account Team/CLEC Care Team Procedures documentation and found the following issues:

1. The document contains multiple references to "Account Team/CLEC Care Team" and "Sales/Sales Support Directors" which can imply both groups are responsible for performing the same functions. This is inconsistent with KPMG Consulting's understanding of the new Account Team/CLEC Care Team structure.
2. The document states that the Account Team/CLEC Care Team "serves as the single point of contact for all pre-order needs," however it does not address ordering or post-ordering needs (e.g. Management of PMAP and Billing issues).
3. The document does not define Premium and Complex Resale Services supported by the Account Team.
4. The document states: "The criterion for a wholesale customer to have an assigned LSM (Local Support Manager) is annual revenue for BellSouth in

¹ Account Team/CLEC Care Team Procedures, Account Team/CLEC Care Team Information Package, Version 9, January 30, 2002.

FLORIDA OSS BELLSOUTH'S RESPONSE TO OBSERVATION 165

UNE and simple resale product," however no annual revenue target is provided.

Impact:

Without well-defined, documented procedures, it is difficult to determine which activities the Account Team should execute and which should be executed by the CLEC Care Team. This issue could result in the inconsistent management of CLEC issues and adversely impact the CLEC's ability to conduct business.

BellSouth Response:

BellSouth has updated specific sections of the Account Team/CLEC Care Team Procedures document to address the four issues cited in this observation. In addition, other sections of the document have been revised to more clearly explain how the Account and CLEC Care Teams are to function in the re-structured organization. Below is a summary of each of the four concerns presented in the observation, along with BellSouth's response and a reference as to where each concern is addressed in the document.

1. The document contains multiple references to "Account Team/CLEC Care Team" and "Sales/Sales Support Directors" which can imply both groups are responsible for performing the same functions. This is inconsistent with KPMG Consulting's understanding of the new Account Team/CLEC Care Team structure.

It appears that KPMG has an incorrect understanding of the new Account Team/CLEC Care Team structure, as there are many instances where the Account Team and the CLEC Care Team perform similar functions in support of customers. In particular, the Sales Director and Sales Support Director have very comparable roles. Therefore, several sections of the document apply to and should be followed by both groups and titles. However, to clarify this point, a paragraph has been added to Chapter 2.0 to explain how to interpret references that read "Account Team/CLEC Care" or "Sales/Sales Director." Elsewhere throughout the document, where terms had been separated by a virgule, the actual title of the person performing the task has now been inserted where appropriate.

2. The document states that the Account Team/CLEC Care Team "serves as the single point of contact for all pre-order needs," however it does not address ordering or post-ordering needs (e.g. Management of PMAP and Billing issues).

FLORIDA OSS BELL SOUTH'S RESPONSE TO OBSERVATION 165

Ordering and post ordering needs do not fall within the purview of Account Team/CLEC Care Team's responsibilities. However, the Account Team/CLEC Care Team faces the ongoing challenge of addressing this misconception. In order to increase the understanding of how ordering and post ordering issues should be correctly handled, the following sections have been enhanced and/or rearranged: 12.1, 12.2, and the last bullet point of section 13.2.

To summarize these sections, in their consultative role, the Account Team/CLEC Care Team may receive ordering and post ordering questions. The proper response is to direct the customer to contact the CSM and/or the specific center that processes customer orders.

The management of PMAP and Billing issues is covered in chapters 10.0 and 14.0 respectively. However, in Chapter 10.0, references to Account Team/CLEC Care Team have been changed to read "Local Contract Manager."

3. The document does not define Premium and Complex Resale Services supported by the Account Team.

See section 4.0.

4. The document states: "The criterion for a wholesale customer to have an assigned LSM (Local Support Manager) is annual revenue for BellSouth in UNE and simple resale product," however no annual revenue target is provided.

See Section 5.3.

OBSERVATION 170

BellSouth Florida OSS Testing Evaluation

Date: March 04, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Account Establishment and Management Review. (PPR2)

Observation:

BellSouth's External Response Team (ERT) Account Management sub-process for responding to written CLEC correspondence is not documented. (PPR2)

Background:

The BellSouth ERT is a sub process the Account Team/ Competitive Local Exchange Carrier (CLEC) Care Team uses to respond to CLEC requests in writing.

Issue:

BellSouth requires that certain written correspondence to CLECs go through the ERT process. The Account Team/CLEC Care Team determines which CLEC written correspondence goes through ERT. The criteria for determining which CLEC written correspondence goes through ERT is not documented.

Impact:

Without documented criteria, the Account Team/CLEC Care Team may be unable to ensure the ERT process is utilized on a consistent, repeatable basis. The inability to consistently manage CLEC issues could negatively impact a CLEC's ability to conduct business.

FLORIDA OSS BELL SOUTH'S RESPONSE TO OBSERVATION 170



Florida OSS Test
Observation 170

March 7, 2002

OBSERVATION REPORT

An observation has been identified as a result of the test activities associated with the Account Establishment and Management Review. (PPR2)

Observation:

BellSouth's External Response Team (ERT) Account Management sub-process for responding to written CLEC correspondence is not documented. (PPR2)

Background:

The BellSouth ERT is a sub process the Account Team/ Competitive Local Exchange Carrier (CLEC) Care Team uses to respond to CLEC requests in writing.

Issue:

BellSouth requires that certain written correspondence to CLECs go through the ERT process. The Account Team/CLEC Care Team determines which CLEC written correspondence goes through ERT. The criteria for determining which CLEC written correspondence goes through ERT is not documented.

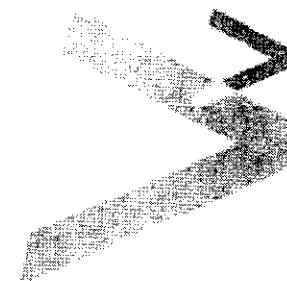
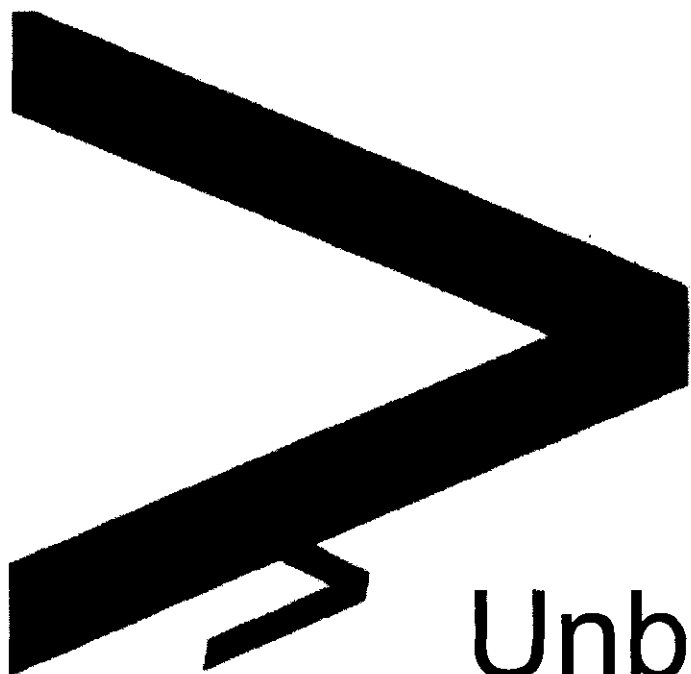
Impact:

Without documented criteria, the Account Team/CLEC Care Team may be unable to ensure the ERT process is utilized on a consistent, repeatable basis. The inability to consistently manage CLEC issues could negatively impact a CLEC's ability to conduct business.

BellSouth Response:

BellSouth has updated the Account Team/CLEC Care Team Procedures to address the circumstances under which the Account Team/CLEC Care Team may consult with the External Response Team (ERT). The document also includes the procedures to be followed when the ERT process will be used. Please see section 13.3 and Appendix H of the document.

ATTACHMENT 3



Unbundled Port/Loop Switched Combinations

Jim Maziarz
March 22, 2001

>>> connect >> and create something





UNE Port/Loop Switched Combinations Defined



UNE Port/Loop Switched Combinations are wholesale service offerings that combine a particular UNE switch port and loop along with end office and tandem switching and shared interoffice transport to create an end user-to-end user transmission path and provide local exchange service.

UNE Port/Loop Switched Combinations replicate many of BellSouth's retail residence and business local exchange services (e.g. BellSouth's 1FR, 1FB, BRI and PRI).

Allows a CLEC to purchase all of the necessary network elements to provide certain telecommunications services without building a network.

>>> *connect >> and create something*





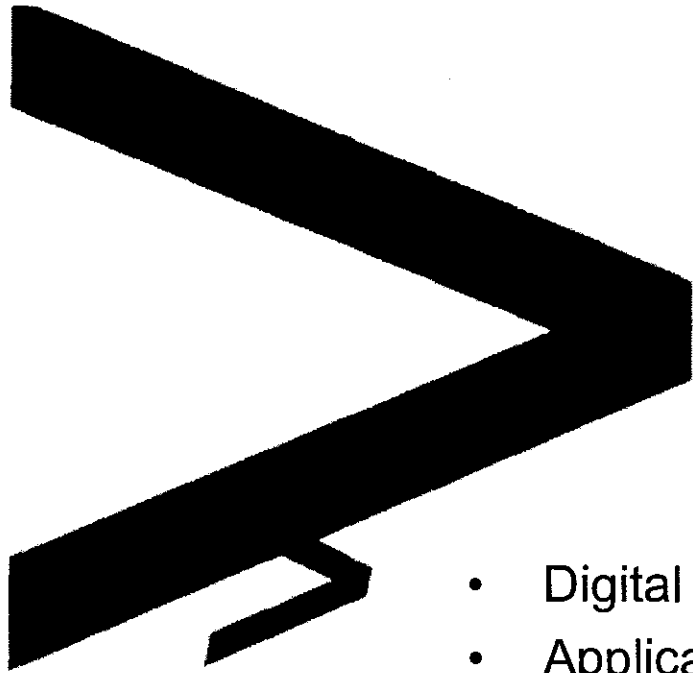
Specific UNE Port/Loop Switched Combinations



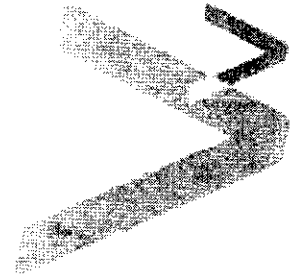
- 2-Wire Analog Port for Residential and Business with 2-Wire Analog Loop (UNE-P)
- 2-Wire Analog Port for PBX with 2-Wire Analog Loop
- 2-Wire Coin Port with 2-Wire Analog Loop
- 2-Wire ISDN Digital Grade Loop with 2-Wire ISDN Digital Port
- 4-Wire DS1 Digital Grade Loop with 4-Wire ISDN Digital Port
- 2-Wire DID Trunk Port for Business with 2-Wire Analog Loop
- Direct Digital Integration Termination Service (DDITS)
- 4-Wire DS1 Loop with Channelization with Port

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DDITS



- Digital Trunk Side UNE Port and UNE DS1 Loop
- Applicable to Digital Switches Only
- Service Offerings
 - Inward Only Without DID
 - Outdial
 - Combination Trunks
 - 2-Way Trunks with DID with User Transfer
 - DID Service
- BellSouth Retail equivalent is provided as a Special Assembly

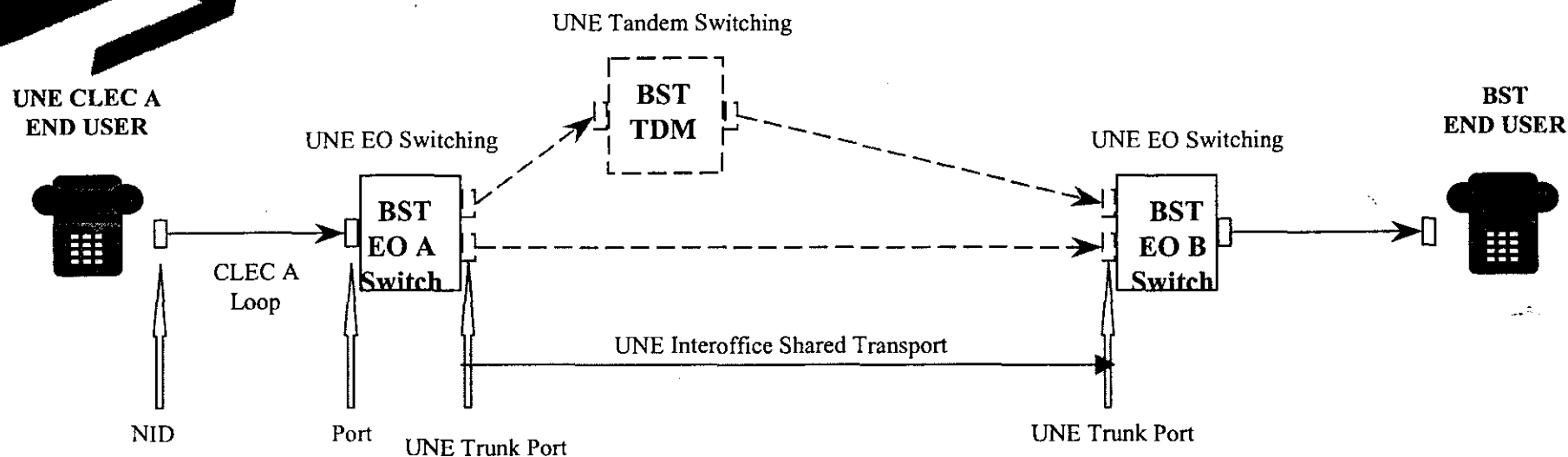


Common Rate Elements



- UNE Port
- UNE Loop
- UNE End Office Switching
- UNE End Office Trunk Port
- UNE Tandem Switching
- UNE Tandem Trunk Port
- UNE Interoffice Shared Transport
 - Facility Termination
 - Per mile, per mou

Rate Elements & Billing



- UNE Loop and Port
- UNE End Office Switching (originating and terminating)
- UNE End Office Trunk Ports
- Vertical and/or Other Feature Charges

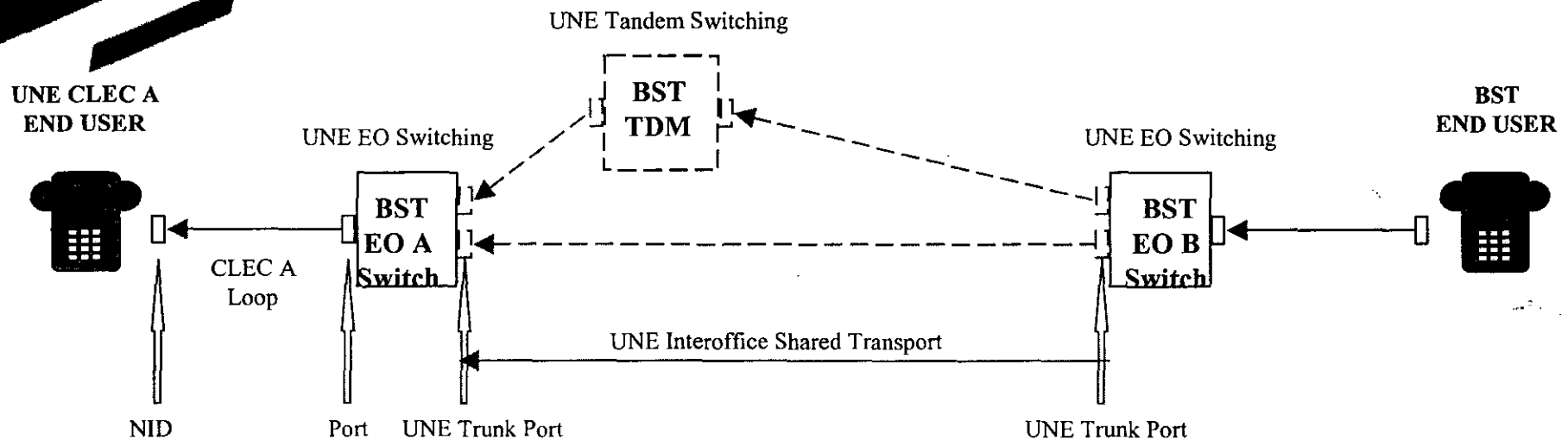
BST bills CLEC A

- UNE Interoffice Shared Transport (Facility Termination and per mile, per mou)
- UNE Tandem Switching
- UNE Tandem Trunk Ports

>>> connect >> and create something



Rate Elements & Billing



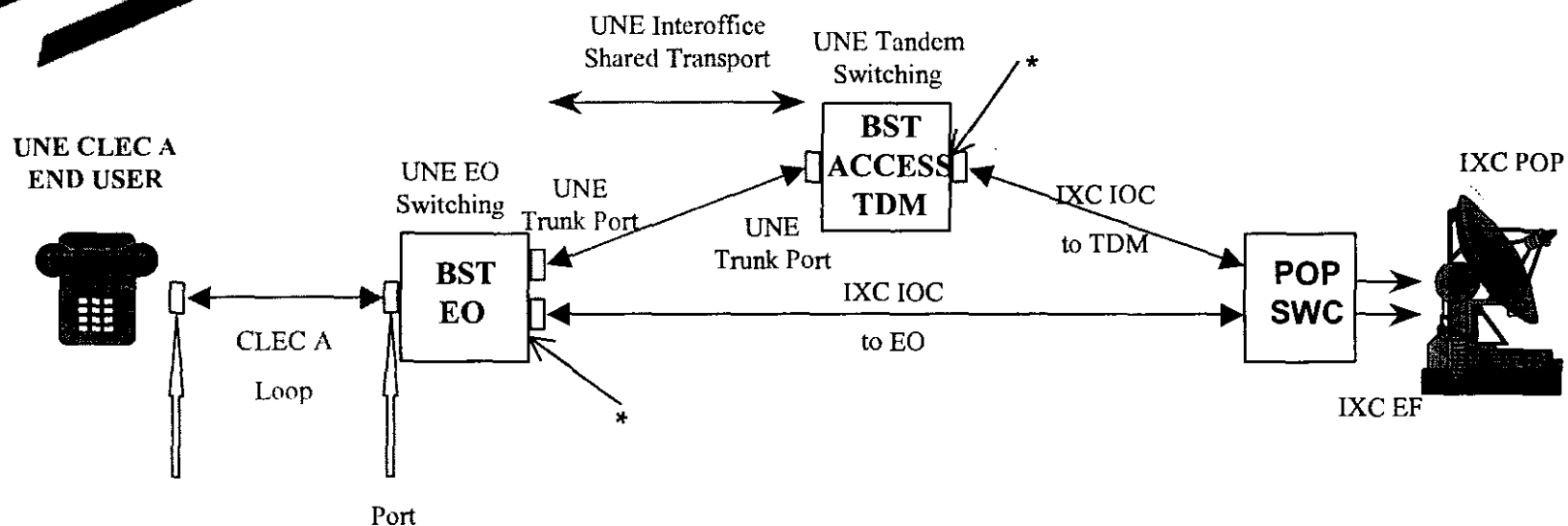
BST bills CLEC A
-- ULS-LP (loop and port monthly)

BellSouth does not charge CLEC A for the UNE Usage elements in this scenario, therefore CLEC A does not bill BellSouth for terminating the call.

>>> connect >> and create something



Rate Elements & Billing



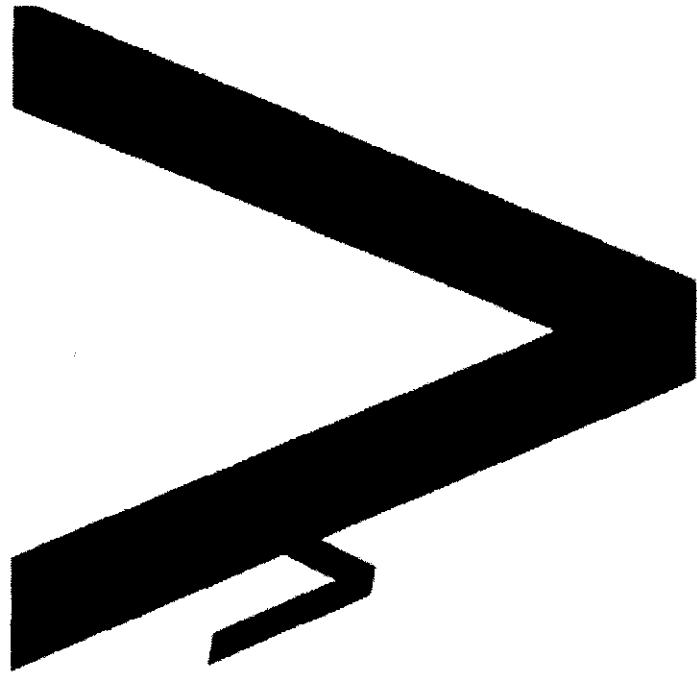
BST bills CLEC A

- UNE Loop and Port
- UNE End Office Switching (originating and terminating)
- UNE End Office Trunk Ports
- Vertical and/or Other Feature Charges
- UNE Interoffice Shared Transport (Facility Termination and per mile, per mou)
- UNE Tandem Switching
- UNE Tandem Trunk Ports

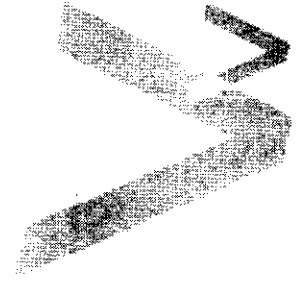
UNE CLEC A may bill the IXC for Originating and Terminating Switched Access.

>>> connect >> and create something

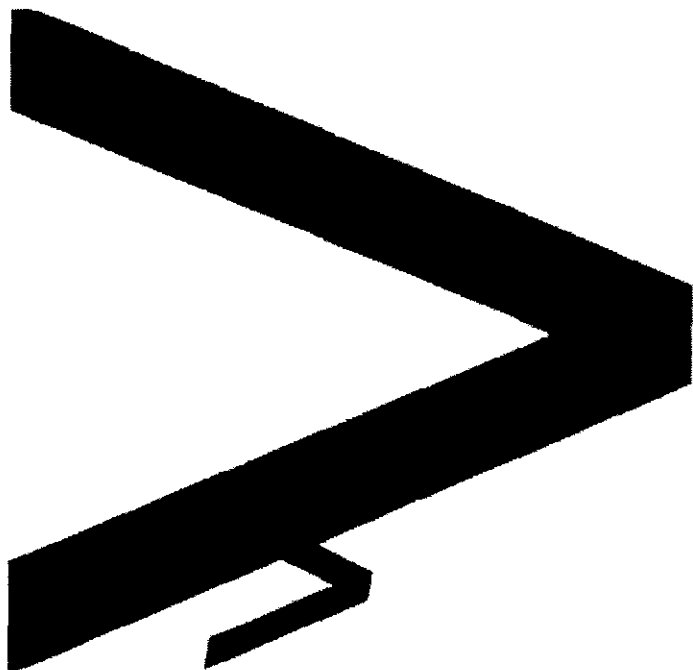




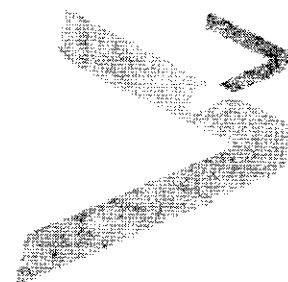
Market Rates vs TELRIC Rates



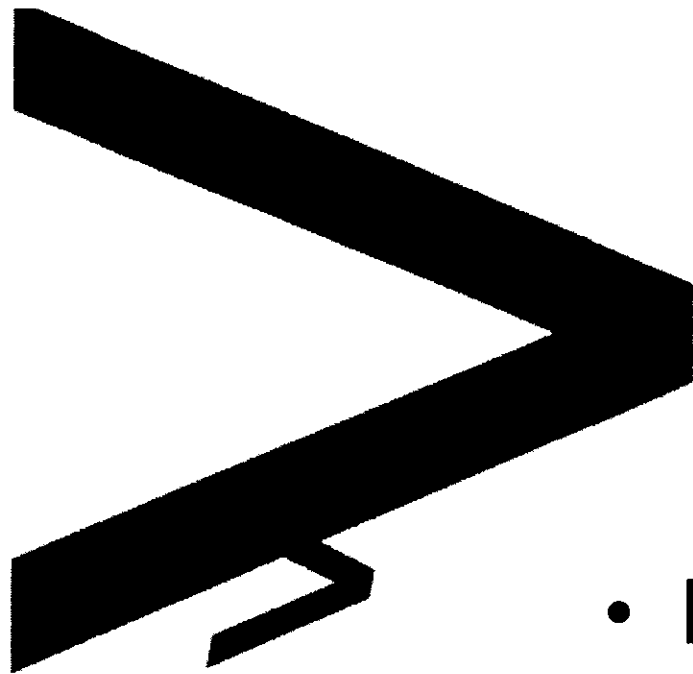
- Market Rates (UNE-P)
 - Zone 1, Top 8 MSAs, End User > 3 lines
 - Not Currently Combined UNEs (except GA)
- TELRIC Rates (UNE-P)
 - scenarios other than as described above



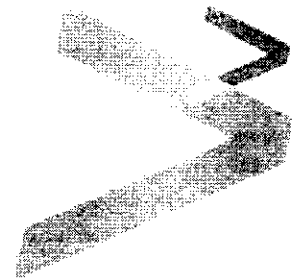
ADUF & ODUF



- ADUF
 - Daily information of the CLEC's end users' originating and terminating access Carrier messages associated with UNE switch ports.
- ODUF
 - Daily access to the CLEC's end users' local billing data.



Information Resources



- Interconnection Website
 - www.interconnection.bellsouth.com
- Account Team
- Ordering Guides
- USOC Manual
- BST GSST

ATTACHMENT 4

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91082394**

Date: May 18, 2001

To: Competitive Local Exchange Carriers (CLECs) Utilizing Unbundled Local Switching and Unbundled Network Elements Port/Loop Combinations

Subject: CLECs – Local Access and Transport Area (LATA)-Wide Local Calling Scope Enhancement for Unbundled Local Switching and Unbundled Network Elements Port/Loop (UNE-P) Combinations

Provision of Unbundled Local Switching and UNE-P Combinations by BellSouth, provides a CLEC with the unbundled network elements necessary to send and receive calls within BellSouth seven-digit and ten-digit local calling scopes. Until recently, CLEC calls originating within a local calling area and terminating outside of that area, but still within the LATA, were not included with the aforementioned services in terms of being transported by BellSouth. Typically calls terminating outside of the local calling area were routed to the CLEC subscriber's Local Presubscribed Interexchange Carrier (LPIC) for termination.

BellSouth is pleased to announce an enhancement to be effective on May 25, 2001 to Unbundled Local Switching and UNE-P Combinations to include an option that will allow CLECs to select a BellSouth provided LATA-wide local calling area. Certain terms and conditions apply with this enhancement and must be incorporated into the Interconnection Agreement between BellSouth and a CLEC before this service may be ordered. Any CLEC interested in this service should contact the appropriate BellSouth contract negotiators for more information regarding amendments to contracts.

One of the conditions in providing this enhancement is the selection of BellSouth as the LPIC. If provided in the CLEC's Interconnection Agreement, when this selection is made usage charges shall be billed for the additional Unbundled Network Elements (UNE) transport and switching associated with the call. Additionally, It has been determined that previous ordering restrictions to prevent the selection of BellSouth as the LPIC, while using these services, were not always effective. Therefore, if a CLEC has been able to previously select BellSouth as the end-user LPIC, beginning on May 25, 2001, BellSouth shall begin billing UNE transport and switching charges associated with using the BellSouth LPIC.

Again, the CLEC's Interconnection Agreement must be amended to reflect this LATA-wide local calling capability. If your company has been or wants to be able to select BellSouth as the end-user LPIC, please contact your BellSouth contract negotiator so that the appropriate amendments may be included with your company's contract.

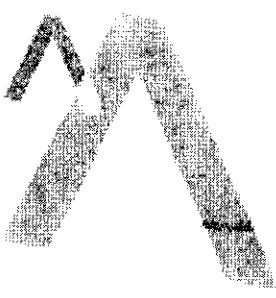
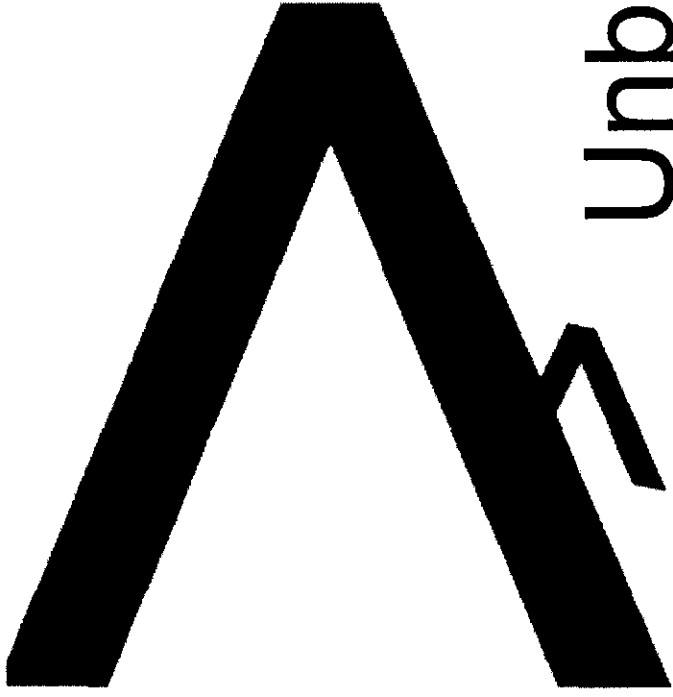
Should you have any questions, please contact your BellSouth account team representative.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

ATTACHMENT 5



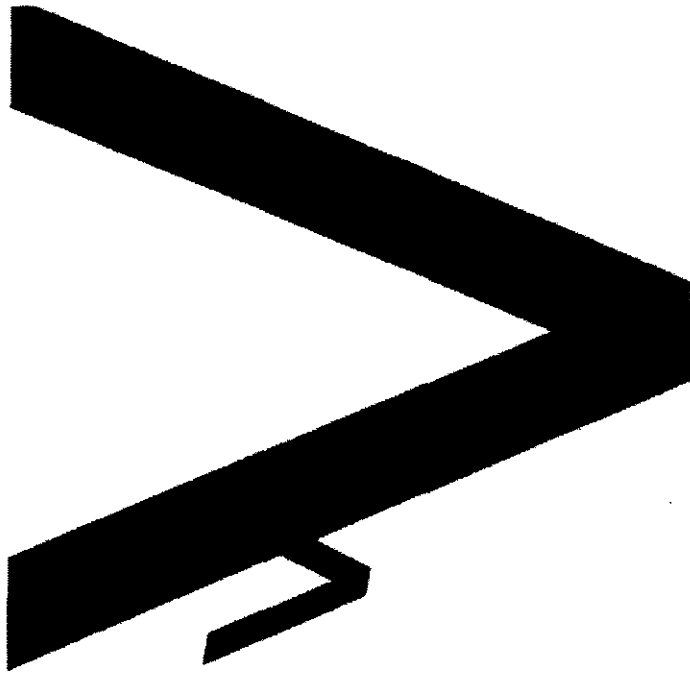
Unbundled Port/Loop Switched Combinations

Jim Maziarz

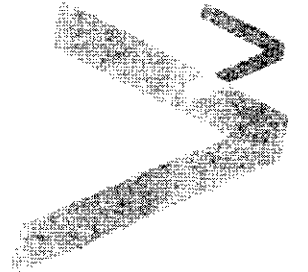
May 23, 2001

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 **BELLSOUTH®**



UNE-P Topics



- Vertical Feature Rate Structure
- UNE-P USOCs and Dialing Parity
- Lata-Wide Local Calling with UNE-P
- DSL on UNE-P



Vertical Feature Rate Structure



- Applies to Stand Alone Ports and Port/Loop Combos of Res, Bus and PBX (UNE-P), Coin and BRI.
- Currently:
 1. No Features, No Charge (Featureless Port)
 2. All Available Features Charge (UEPVF)
 3. Three Available Features Charge
 4. Individual Vertical Features Charge
 5. Features included with the UNE Port Charge (GA & TN)
- New Rate Structure
 1. No Features, No Charge (Featureless Port)
 2. All Available Features Charge (UEPVF)
 3. Features included with the UNE Port Charge (GA & TN)

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UNE USOCs and Local Dialing Parity



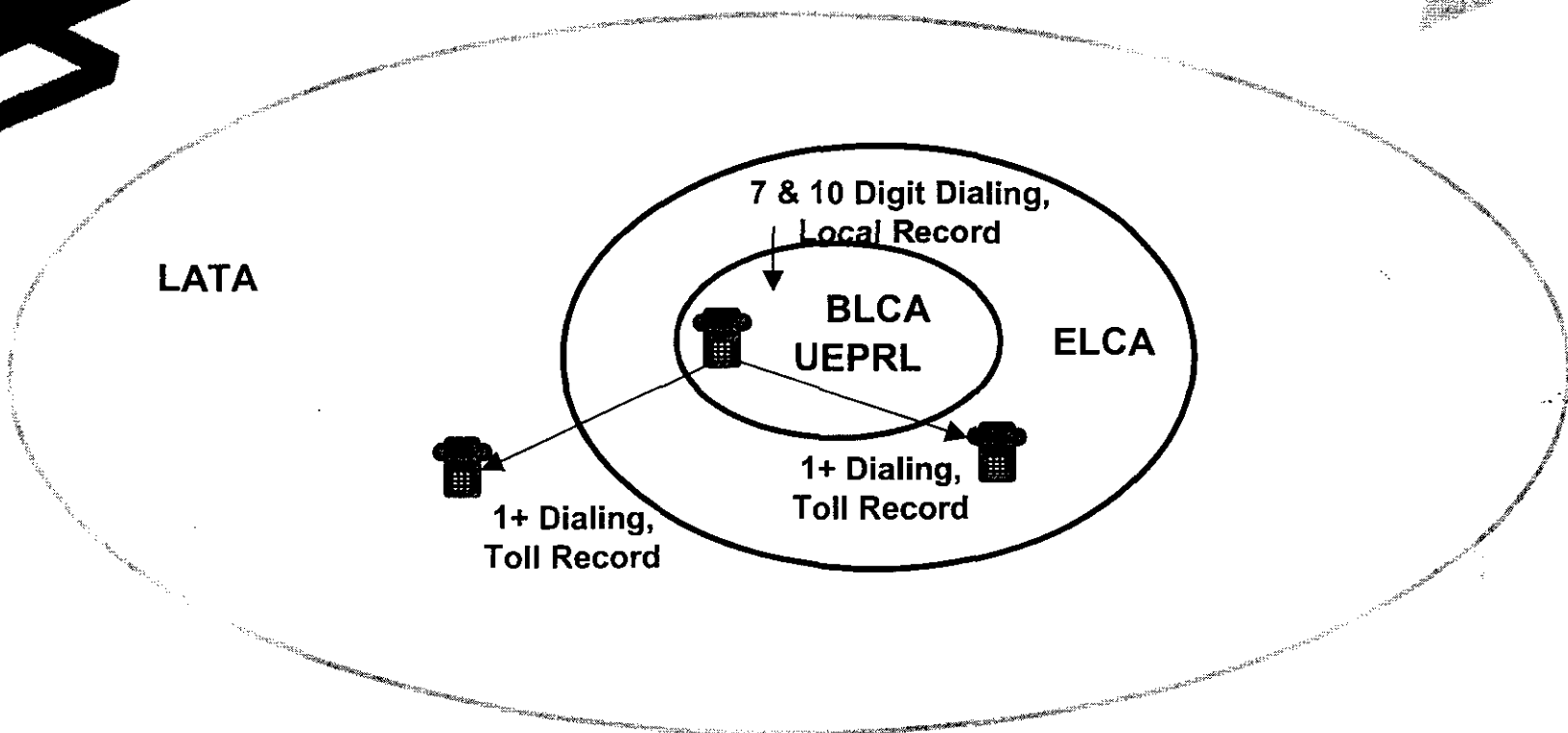
- UNE USOCs listed in the Information Guide provide the same 7 & 10 digit and 1+ dialing arrangements as the BellSouth retail USOCs that they are converted from.
- Example:

| DESCRIPTION | STATE | UNE USOC | BELLSOUTH RETAIL USOC(s) THAT MAY BE CONVERTED TO THE APPLICABLE UNE USOC |
|---|-------|----------|---|
| PORT WITHOUT CALLER ID | ALL | UEPRL | 14D, 14R, 14X, 1DF, 1DM, 1ER, 1ERNF, 1FR, 1FW, 1KS, 1MR, 1MS, 24R, 2FR, 44R, 4FR, 4LP, LF5, LF8, LM8, LMR, LW1, R1M, RUA, RUC, VR3, |
| RESIDENCE CALLING PLAN | | | |
| ALABAMA EXTENDED LOCAL DIALING PARITY PORT WITH CALLER ID | AL | UEPAR | AC1, AC1CL, ACP, ACPCL, ACR, ACRCL, AP1, AP1CL, AP2, AP2CL, ASR, ASRCL |

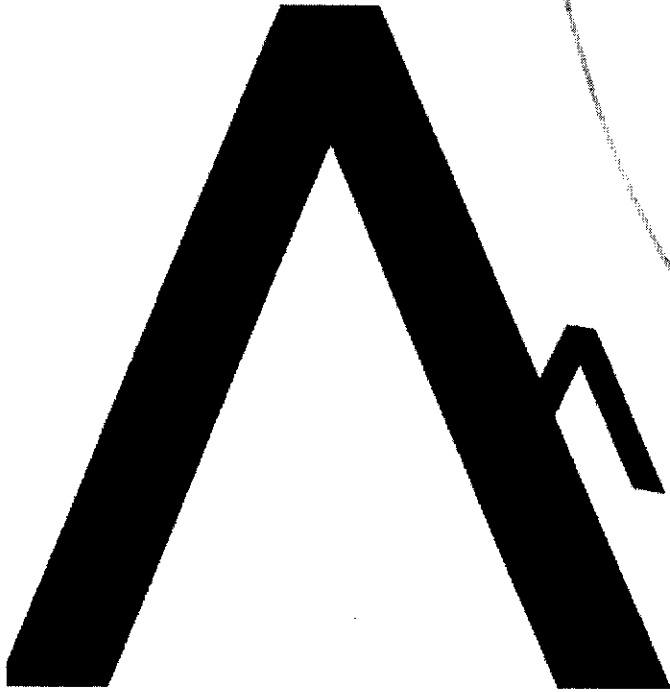
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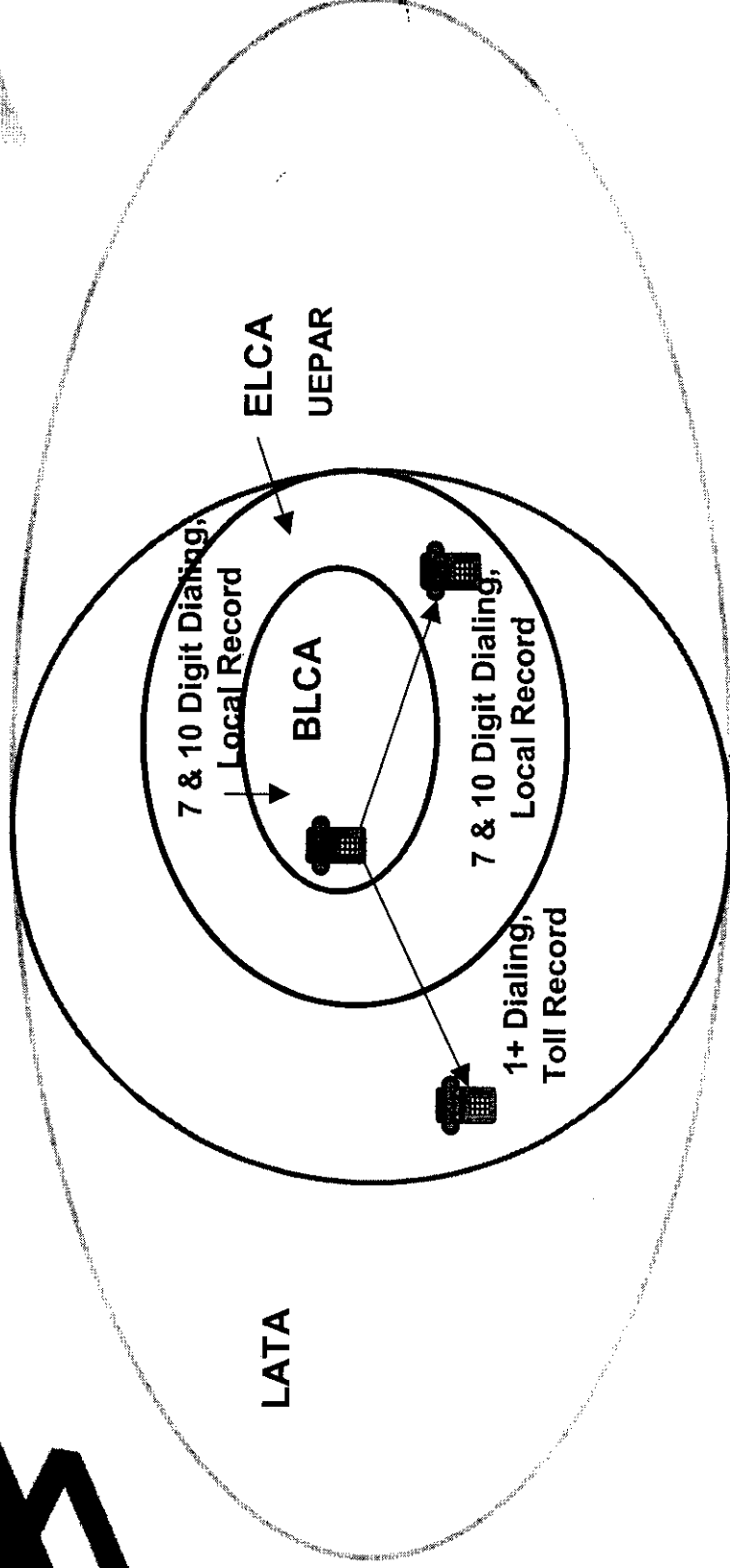
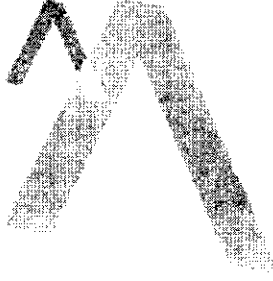
UNE USOCs and Dialing Parity



>>> connect >> and create something



UNE USOCs and Dialing Parity



>>> connect >> and create something

 **BELLSOUTH®**



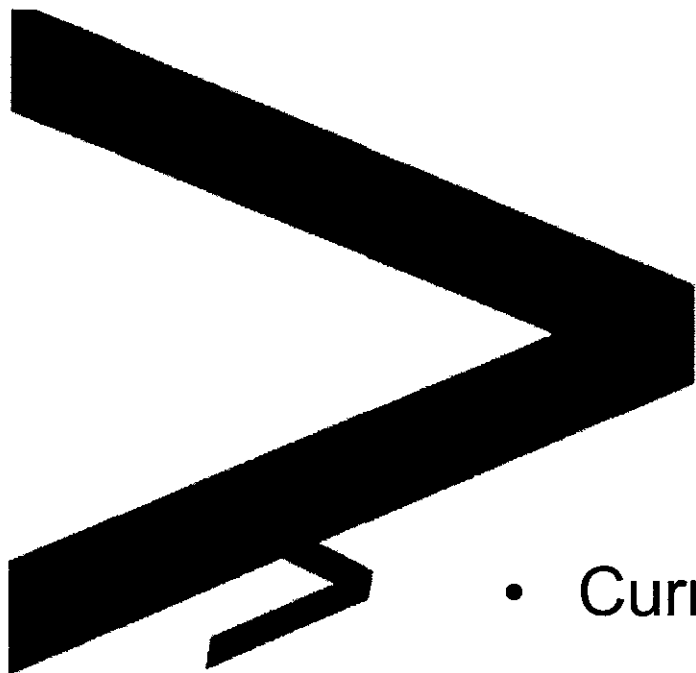
Lata-Wide Local Calling with UNE-P



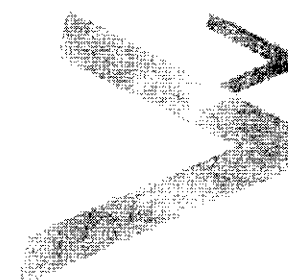
- Available May 25, 2001
- Requires CLEC to LPIC BellSouth Telecommunications (5124) in order for calls to be transported by BellSouth.
- Calls terminated between the Parties shall be treated as local calls.
- Specific terms and conditions need to be incorporated in the Parties Interconnection Agreement, so an amendment is necessary.
- If BellSouth has been previously selected as the LPIC, UNE Usage billing shall commence on May 25, 2001.

>>> connect >> and create something





DSL on UNE-P



- Currently not available.
- BellSouth is analyzing the business opportunity.

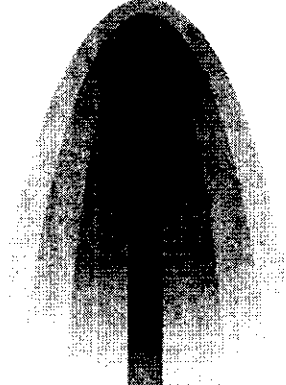
ATTACHMENT 6

Pending Service Orders

- ADSL
- Local Service Freeze

CSR Updates

- Updating Time Frames 24 - 72 hrs



Pending Service Orders

- Complex Issue !!!!
 - BST - ALEC
 - ALEC - ALEC
 - ALEC - BST
- LCSC processes w/o clarification when possible
- Study of 187 PSO request
 - 133 Processed w/o clarifications
 - 29 Clarified for reasons other than PSO
 - 25 clarified for PSO issue
 - 15 BST PSO
 - 10 ALEC PSO
- CCP Issue to gain consensus of ALECs

ADSL USOC

- ✓ ALEC Responsibility to contact end-user removal BEFORE processing
- ✓ Current Clarification Process implemented at ALEC initiative
- ✓ Long Term Resolution CR0625
- ✓ Interim Solution

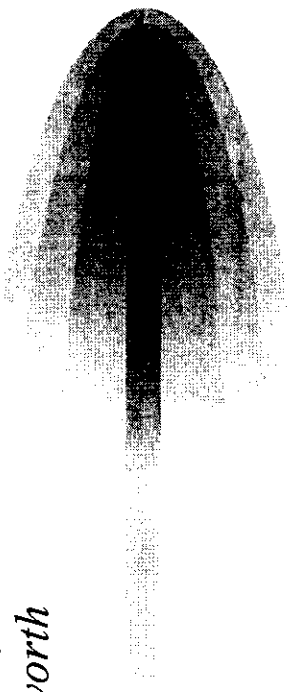
Local Service Freeze

- ✓ FCC Slamming Rules (47 CFR Part 64; CC Docket 94-129; FCC 00-255 & FCC 01-67)
- ✓ Protection of End-Users
- ✓ January data indicates very low clarification rate for LSF (15/67,000)
- ✓ BST must support existing Rules

Question & Answer Session

*Presented By:
Ken Ainsworth*

- CSR Updates



ATTACHMENT 7

REDACTED

-----Original Message-----

From: amanda hill [mailto:amanda.hill@wcom.com]

Sent: Tuesday, March 05, 2002 5:13 PM

To: BSTIssues (E-mail)

Cc: Tyra. Hush (E-mail)

Subject: Definition for FIDS

<< File: Definition.txt >> << File: Definition.txt >> << File: FIDS_F-1.DOC
>> All,

BellSouth answers to our FID questions.

FIDs that are related to orders falling to manual handling:

1. OZIP: The Zip code in the directory section of the retail account has incorrect format.
2. OISF: Bill Fid valid for BellSouth retail accounts.
3. ZDCO: Bill Fid valid for BellSouth retail accounts in Florida.
4. Difference between OISF & Bill Fid:
 OISF is a type of bill fid. OISF was broken down on the spreadsheet because it had been addressed on the previous pons
 investigated by Kathy Ragsdale.

BST has identified the flow through errors in reference to the listed FID's and are working on a process correction; however, a targeted date of completion has not been determined.

Thanks,

Amanda Hill
Carrier Management
770-625-6134

REDACTED

ATTACHMENT 8

| Telephone Number | SOCS Order Type | SOCS Completion Date | Comments | LMOS |
|------------------|-----------------------------|----------------------|---|--|
| 404-755-1920 | Conversion to UNE-P service | 12/4/01 | <p>The number provided appears on the list on more than one occasion.</p> <p>Conversion service orders worked correct. No loss of service to the end user caused by the service orders.</p> | <p>Trouble reported 12/07/01 @ 10:02P and closed 12/08/01 @ 10:53A. Trouble reported that the drop was low. The technician was unable to gain access to the drop to repair the condition. Ticket closed.</p> <p>Trouble reported 12/08/01 @ 5:31P and closed 12/10/01 @ 11:35A. Trouble reported that the drop was down. The technician replaced the drop and closed the ticket.</p> |
| 770-279-1834 | Conversion to UNE-P service | 12/4/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | <p>Trouble reported 12/05/01 @ 2:47P and closed 12/5/01 @ 4:29P. The trouble was reported as no dial tone. The technician indicated that there was no trouble in the BellSouth Network, closing the ticket indicating the line was okay to the Network Interface Device (NID).</p> |

| | | | | |
|--------------|-----------------------------|---------|--|--|
| 770-382-2178 | Conversion to UNE-P service | 12/5/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/10/01 @ 4:02P and closed 12/11/01 9:26A. The trouble was reported as no dial tone. The Mechanized Loop Test (MLT) test indicated a short on the line possible ringer off hook condition when the trouble was opened. Prior to a technician dispatch another MLT test was performed indicating that the line now tested okay and the ticket was closed. |
| 770-967-1571 | Conversion to UNE-P service | 12/5/01 | The facilities changed on the conversion orders. | Trouble reported 12/06/01 @ 9:44P and closed 12/7/01 @ 10:27A. The trouble was reported as no dial tone. The technician found a faulty cable pair and changed the facilities. The technician closed the ticket. |
| 404-315-7472 | Conversion to UNE-P service | 12/6/01 | The D order contained an error causing the service to be interrupted. | Trouble reported 12/10/2001 @ 9:40P and closed 12/11/2001 @ 6:16A. The number was built back in translations and the ticket was closed. |
| 678-475-1686 | Conversion to UNE-P service | 12/6/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/07/01 @ 9:40A and closed 12/7/01 1:56:P. The trouble was reported as no dial tone. The MLT tested bad at the Remote Terminal (RT). The technician corrected a trouble condition in the RT and reset the electronic cross connect and then closed the ticket. |

| | | | | |
|--------------|-----------------------------|---------|--|---|
| 770-258-5636 | Conversion to UNE-P service | 12/6/01 | The Office Equipment (OE) in the Central Office (CO) changed on the orders. | Trouble reported 12/6/01 @ 8:49P and closed 12/7/01 @ 12:36P. The trouble was reported as no dial tone. The MLT test indicated an Open in the CO. The CO technician had worked the OE change on the order prior to receiving the trouble ticket. When the CO technician received the trouble ticket, the ticket was closed as no trouble found. |
| 770-323-8511 | Conversion to UNE-P service | 12/6/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/7/01 @ 4:27P and closed 12/10/01 4:18P. The trouble was reported as no dial tone. The MLT test indicated a Busy Speech condition. The technician placed the ticket in no access and indicated that no ringers were detected from the pedestal. At 12/10/01 @ 11:21A, MCI called back in to provide access information. The technician replaced a defective RJ11C and closed the ticket. |
| 770-774-1125 | Conversion to UNE-P service | 12/6/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/10/01 @ 11:23A and closed 12/10/01 @ 2:08P. The trouble was reported as no dial tone. The MLT test indicated an open condition near the drop. The technician found the trouble not to be in the BellSouth network and closed the ticket. |

| | | | | |
|--------------|-----------------------------|----------|--|--|
| 770-834-4276 | Conversion to UNE-P service | 12/6/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/11/01 @ 9:09A and closed 12/11/01 @ 10:56A. The trouble reported as no dial tone. The MLT test did not perform because all access was busy. The technician replaced the cross box and closed the ticket. |
| 404-635-1230 | Conversion to UNE-P service | 12/7/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/10/01 @ 10:45P and closed 12/11/01 @ 4:27P. The trouble is The MLT test did not perform because all access was busy. The technician found and replaced a defective F2 pair and closed the ticket. |
| 770-578-6216 | Conversion to UNE-P service | 12/7/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12-09-01 @ 3:08P and closed 12-10-01 @ 9:13A. The MLT test did not perform because all access was busy. The technician found dial tone leaving the CO and the line tested okay. The ticket was closed. |
| 770-410-3483 | Conversion to UNE-P service | 12/10/01 | The D order contained an error causing the service to be interrupted. | Trouble reported 12/11/01 @ 10:35A and closed 12/11/01 @ 12:37P. The number was built back in translations and the ticket was closed. |

| | | | | |
|--------------|-----------------------------|----------|--|--|
| 770-458-5943 | Conversion to UNE-P service | 12/10/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/11/01 @ 1:12P and closed 12/11/01 @ 3:10P. The trouble reported a no dial tone condition and requested the line be tagged at the DMARC. The MLT test indicated a ringer off hook condition. The technician found no trouble in the BellSouth network, tagged the line at the DMARC, and closed the ticket. |
| 770-923-4890 | Conversion to UNE-P service | 12/10/01 | Conversion service orders worked correct. No loss of service to the end user caused by the service orders. | Trouble reported 12/11/01 @ 10:14A and closed 12/11/01 @ 1:45P. The trouble was reported as no dial tone. The trouble was related to an existing cable failure condition and was closed when the fiber was repaired. |

BellSouth Interconnection Services

600 North 19th Street
8th Floor
Birmingham, Al. 35203

March 7, 2002

Ms. Amanda Hill
Manager - Carrier Management
WORLDCOM
Two Northwinds Center
2520 Northwinds Parkway Suite 500
Alpharetta, Georgia 30004

Dear Amanda:

This is in response to Sherry Lichtenberg's verbal request of February 28, 2002, for BellSouth to provide a written explanation regarding fifteen end users who experienced a loss of dial tone during the conversion to Unbundled Network Element-Platform (UNE-P) service in December 2001. Please refer to the attached spreadsheet for the results of BellSouth's investigation.

I hope the attached information satisfies your concerns regarding this matter. Please feel free to call me at 205-321-4944, if you have additional questions.

Sincerely,

Sheila Rockett
Local Contract Manager
CLEC Care

Attachment

cc: Van Cooper

ATTACHMENT 9

BellSouth Interconnection Services

1960 West Exchange Place
Suite 420
Tucker, Georgia 30084

February 19, 2002

Ms. Amanda Hill
Manager - Carrier Management
WORLDCOM
Two Northwinds Center
2520 Northwinds Parkway
Suite 500
Alpharetta, Georgia 30004

Dear Amanda:

This is the response to Sherry Litchenberg's verbal request of January 10, 2002, for BellSouth to perform an analysis of MCI metro's (MCIm) Florida Local Service Requests (LSR) that drop to the Local Carrier Service Center (LCSC) for manual processing.

Ms. Litchenberg requested that the analysis be made on a random sampling of LSRs, similar to the analysis of LSRs performed by BellSouth in October 2001 (the October 3, 2001 letter is attached for your convenience). This request was made after Ms. Litchenberg agreed to close this issue when the results of the October 2001 analysis were received.

However, BellSouth has now completed this analysis, and the results are below.

As we discussed during the weekly conference call on January 30, 2002, these investigations are quite time-consuming. BellSouth introduced a proposal that will have a more positive impact on MCIm's Flow Through process. BellSouth has proposed, and is presently gathering data, to examine MCIm's top five clarification reasons. The affect of this would be to clear those larger volumes of fallout and work down to the smaller volumes. This is in keeping with MCIm's stated objective of decreasing manual handling of its LSRs.

I am sure you understand that to complete this task, BellSouth must dedicate the resources necessary to assist MCIm with this objective. BellSouth appreciates your patience while this task is ongoing. The latest analysis is broken down by the month of November and December 2001. The analysis is categorized by the reason LSRs fell out for manual handling, and then by clarification reason, if applicable.

Of the Florida LSRs that dropped for manual handling in November 2001, BellSouth clarified approximately 3% in error. Of 121 LSRs researched, BellSouth found that service

representatives returned 4 to MCI that should not have been clarified:

- 62 orders fell out for error code 8825 (ZLIG, OZIP, ZDCO)
- 59 orders fell out for error code 8820 (Bill FID/Installment Service Fee)

Of the Florida LSRs that dropped for manual handling in December 2001, BellSouth clarified approximately 4% in error. Of the 271 LSRs researched, BellSouth found that service representatives returned 13 to MCI that should not have been clarified:

- 136 orders fell out for error code 8825 (ZLIG, OZIP, ZDCO)
- 96 orders fell out for error code 8820 (Bill FID/Installment Service Fee)
- 27 orders fell out for error code 1000 (Clarification by a service representative)
- 4 orders fell out for error code 7235 (TN required)
- 3 orders fell out for error code 7710 (Cannot change due date)
- 2 orders fell out for error code 7465 (Cannot cancel order)
- 2 orders fell out for error code 9685 (Due Date could not be calculated)
- 1 order fell out for error code 7495 (UNE Dire locator problem)

When MCI believes that an LSR has been clarified in error, please contact the LCSC as soon as possible so that the order is not delayed further. This will also provide immediate feedback where needed.

As stated above, BellSouth will focus its efforts on assisting with immediate improvements in Flow Through, according to MCI's objective. This will target the largest volumes of errors that can be resolved in order to prevent manual handling.

I hope the above information satisfies your concerns regarding this matter. Please feel free to call me at 770-492-7543, if you have additional questions.

Sincerely,

Pamela D. Reynolds
Local Contract Manager --
CLEC Care

Attachment

cc: Van Cooper

ATTACHMENT 10

BellSouth Interconnection Services

675 West Peachtree Street
Atlanta, Georgia 30375

**Carrier Notification
SN91082914**

Date: March 5, 2002

To: Competitive Local Exchange Carriers (CLECs)

Subject: CLECs – Update of BellSouth Business Rules for Local Ordering (BBR-LO), Issue 10.4rev

This is to advise that BBR-LO, Issue 10.4rev, is scheduled to be posted to the BellSouth Interconnection Services' Web site on Friday, April 5, 2002. This BBR-LO update includes the changes for Release 10.4 that were previously posted as well as new documentation and clarifications. This update primarily affects documentation and possibly manual and electronic order processing that may impact CLEC operations

Please refer to the attachment to this letter for updates scheduled for Issue 10.4rev:

A summary of all changes within this document will be listed in the **Revision History Section**. This update can be found at the BellSouth Interconnection Services' Web site in the Customer Guides Section at:

<http://www.interconnection.bellsouth.com/guides/index.html>

Please contact your BellSouth Local Support Manager with any questions.

Sincerely,

ORIGINAL SIGNED BY JIM BRINKLEY

Jim Brinkley – Senior Director
BellSouth Interconnection Services

Attachment

| BELLSOUTH® BUSINESS RULES FOR LOCAL ORDERING Issue 10.4rev Posting Date 04/05/2002 / Effective Immediately REQTYPs SERVICE REQUEST MATRIXs | | | | | | |
|---|------------------|---|--|--|-------------------------------------|--|
| CHANGE # | RELEASE AFFECTED | REQ TYP | SECTION | TABLE | COLUMN | DESCRIPTION |
| 3024 CCP- 0657 | 10.4 | REQTYP M [Switched Combina tions] | REQTYP / ACT Combina tions | LSR - REQTYP M / ACT N, C, T, V, P and Q | Optional | Added SPEC. (Making Local Service Freeze available for REQTYP M Non Complex.) |
| 3031 CCP- 0614 | Doc. Defect | REQTYP M [RES/BU S] | REQTYP / ACT Combina tions | LNA = W | Required | Changed 'RQSTY' to "PQTY". |
| 3032 CCP- 0615 | Doc. Defect | REQTYP M UNE P BUS/RE S | Completi ng the LSR and EU Forms/Sc reens | Activity table | — | Removed removing ACTTYP S as a valid ACTTYP. |
| 3034 CCP- 0616 | Doc. Defect | REQTYP E | REQTYP / ACT Combina tions | LSR - REQTYP E / ACT N, C, D, V, and W | Optional | Removed LCON and LCON- TEL NO. . |
| 3035 CCP- 0617 | Doc. Defect | REQTYP E | REQTYP / ACT Combina tions | LSR - REQTYP E / ACT | Required Conditional Optional | Adding R/C/O tables and business rules for WATS service. . (Product Availability). |
| 3035 CCP- 0617 | Doc. Defect | REQTYP E | REQTYP / ACT Combina tions | EU - REQTYP E / ACT | Required Conditional Optional | Adding R/C/O tables and business rules for WATS service. (Product Availability). |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, T, and V, [Designed, Non- Designed] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, and T [Channeliz | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |

| | | | | | | |
|----------------------|----------------------|-------------|-------------------------------------|---|-------------|---|
| | | | | ed, Non-Channelized] | | |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, T, and V [EELs] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, T, and V [UCL] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, T, and V [UCL Non-Designed] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N and C [USL INC] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, T, and W [UDC] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N, C, T, and V [xDSL Loops] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3042 CCP- 0653 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | EU - REQTYP A / ACT N [UDF] | Conditional | Added IWBAN (m) [when requesting wiring on REQTYP A manual order]. |
| 3047 | Doc. Defect | REQTYP A | REQTYP / ACT Combina tions | — | — | NSC service [New Product]. |
| 3056 CCP- 0648 | Doc. Defect | REQTYP J | REQTYP / ACT Combina tions | LACT tables | — | Updated LACT and DACT information (for clarity). Also removed LACT=Z table. |
| 3059 | Clarification | REQTYP A | REQTYP / ACT Combina | — | — | Added RS HFS (Remote Site Unbundled DSL) Line Share BellSouth Owned Splitter. |

| | | | | | | |
|----------------------|---------------------------|--|-------------------------------------|---|----------|---|
| | | | tions | | | [New Product]. |
| 3060 CCP- 0665 | Doc. Defect | REQTYP P [BellSouth Centrex] | - | - | - | Updated REQTYPE=P BellSouth Centrex Subsequent ordering Form (RF-3696) Line By Line change. |
| 3063 | Clarifi cation | REQTYP M | REQTYP / ACT Combina tions | Ordering Forms/Scre ens | - | To add the valid entry of C to the ACT Type combinations table. |
| 3069 | Clarifi cation | REQTYP E ISDN- BRI | REQTYP / ACT Combina tions | EU - REQTYP E, ACT W | Required | Removed LOCNUM (Header) . Added LOCNUM (Detail). |
| 3069 | Clarifi cation | REQTYP E ISDN- BRI | REQTYP / ACT Combina tions | EU - REQTYP E, ACT W | Optional | Removed LOCNUM (Detail). Added LOCNUM (Header). |
| 3070 | Clarifi cation | REQTYP E | - | - | - | Update verbiage for HA Tables for Hunting to clarify the use of HA Tables for Hunting. To add clarity to verbiage within Description of HA Tables for Hunting |
| 3070 | Clarifi cation | REQTYP M | - | - | - | Update verbiage for HA Tables for Hunting to clarify the use of HA Tables for Hunting. To add clarity to verbiage within Description of HA Tables for Hunting |
| 3072 CCP- 0671 | Doc. Defect | REQTYP E | - | - | - | Updated ACT of 'T' description to include "and Inside Moves". |
| 3080 CCP- 0671 | Doc. Defect | REQTYP M | - | - | - | Updated ACT of 'T' description to include "and Inside Moves". |
| 3081 CCP- 0663 | Doc. Defect | REQTYP A [CO Based Line Share] | - | EU - - REQTYP A / ACT V, P and Q | - | Added EATN. |
| 3087 | Clarifi cation | REQTYP P [BellSouth Centrex] | - | - | - | Change made to the documentation correction the WEB address for the official Centrex Ordering Forms and adding the WEB address for BellSouth Centrex/UNE P Centrex Ordering Document. |

| | | | | | | |
|------------------|----------------------|------------------------------------|---|---|---|--|
| 3096 | Clarification | General Local Ordering Information | - | - | - | Added Asymmetrical Digital Subscriber Line (ADSL) [Contact for Questions]. |
| 2654 CCP-0357 | Doc. Only | REQTYP A [UNTW] | - | - | - | Added Unbundled Network Terminating Wire (Manual only) [Product Available]. |

| BELLSOUTH® BUSINESS RULES FOR LOCAL ORDERING Issue 10.4rev Posting Date 04/05/2002 / Effective Immediately DATA ELEMENT DICTIONARY Section | | | | | | |
|--|--------------------------|-------------------------|------------------------------|----------------|------------------------|---|
| CHANGE # | RELEASE affecting | CHAPTER | SECTION | FIELD | Table / Section | DESCRIPTION |
| 3022 CCP-0561 | Doc. Defect | Data Element Dictionary | LSR - Administrative Section | RESID | - | Add new rule: RULE 9: On ACT of V with a mix of new facilities (LNA=N or V) and reuse of existing facilities (LNA=V), the FRN for the new facilities that were reserved should be entered in the RESID field. |
| 3024 CCP-0657 | 10.4 | Data Element Dictionary | LSR - Administrative Section | SPEC | - | Note 2: For REQTYPE and M, LSF Valid Entries (Activity Types = N, C, T, V, P and Q). |
| 3040 CCP-0623 | Doc. Defect | Data Element Dictionary | DL Listing section | LXTY and LTEXT | - | Remove rule 5 from LXTY field and add it to LTEXT field. |
| 3041 CCP-0624 | Doc. Defect | Data Element Dictionary | LSR - Administrative Section | CHC | - | Update VALID ENTRIES for Manual processing. |
| 3042 CCP-0653 | Doc. Defect | Data Element Dictionary | EU - Inside Wiring | IWBAN | - | Add this field a being 'supportable' by BellSouth for manual LSR processing. |
| 3046 CCP-0078 | Doc. Defect | Data Element Dictionary | LSR - Administrative Section | TOS | - | To introduce TOS code of "19-" to TOS requirements . To require specific TOS code of 19- for EELs and NSCs. |

| | | | | | | |
|----------------------|------------------------|-------------------------------|-------------------------|------|---|---|
| 3056 CCP- 0648 | Doc. Defect | Data Element Dictionary | DL - Listing section | LACT | - | Updated, LACT field, to match the OS99 requirements. For REQTYP B&C, ACT V, LACT may be N or Z. For all other REQTYPs, with ACT V, LACT may be I&O, or Z. |
| 3061 CCP- 0660 | Doc. Defect | Data Element Dictionary | EU | WSOP | - | Updated BUSINESS RULES "Rule: Optional if the first character of the TOS field is 2 and REQTYP E and M, otherwise prohibited." |
| 3063 CCP- 0641 | Doc. Defect | Data Element Dictionary | PS | LNA | - | Added the valid entry of C to the ACT Type combinations table. |
| 3063 CCP- 0641 | Doc. Defect | Data Element Dictionary | RS | LNA | - | Added the valid entry of C to the LNA table. |
| 3072 CCP- 0671 | Doc. Defect | Data Element Dictionary | RS | - | - | Updated Resale to indicate which ACT TYP and LNA activity to use for an Inside Move. |
| 3072 CCP- 0671 | Doc. Defect | Data Element Dictionary | PS | - | - | Updated Resale to indicate which ACT TYP and LNA activity to use for an Inside Move. |
| 3074 CCP- 0659 | Doc. Defect | Data Element Dictionary | LSR | AN | - | Added example with hyphens added by electronic system |
| 3074 CCP- 0659 | Doc. Defect | Data Element Dictionary | LSR | ATN | - | Added example with hyphens added by electronic system |
| 3078 CCP- 0662 | Doc. Defect | Data Element Dictionary | RS | LNA | - | Update of LNA Tables Added ACTTYPs P and Q for LNA. |
| 3078 CCP- 0662 | Doc. Defect | Data Element Dictionary | PS | LNA | - | Update of LNA Tables Added ACTTYPs P and Q for LNA. |
| 3079 CCP- 0667 | Doc. Defect | Data Element Dictionary | LSR | RPON | - | Added business rule to RPON that restricts the use of RESH or AECNs that are different [Rule 14: LSRs that use RPON |

| | | | | | | |
|----------------------|---------------------------|-------------------------------|-----------------|--------|---|--|
| | | | | | | must have the same CC or RESH.].. |
| 3080 CCP- 0672 | Doc. Defect | Data Element Dictionary | RS | TC OPT | – | Changing verbiage in the documentation to reflect the message the system will play for callers when a number has been changed or disconnected. |
| 3080 CCP- 0672 | Doc. Defect | Data Element Dictionary | PS | TC OPT | – | Changing verbiage in the documentation to reflect the message the system will play for callers when a number has been changed or disconnected. |
| 3086 CCP- 0664 | Doc. Defect | Data Element Dictionary | LSR- Hunting | HLA | – | Update Field HLA definition [“Identifies the activity associated with the hunt group on this request”]. |
| 3089 | Clarific ation | Data Element Dictionary | LSR | NC | – | Removed NOTE on 3rd & 4th character from table. |

REQTYP A - Unbundled Network Terminating Wire

Tables to request Unbundled Network Terminating Wire service are located in this section.

Ordering Forms

The following chart illustrates the required, conditional and optional forms for ordering this service. Detailed information will follow to assist you in filling out each of these forms.

| | Forms | | | | | | | | | | | | |
|---|----------|----------|-------------|----------|----|------|----|-----|----|----|----------|----------|-----------------|
| REQTYP / SERVICE TYPE | SI | LSR | Hun ting | EU | DL | DSCR | RS | DRS | PS | NP | LS | LS NP | Propri etary |
| A Unbundled Network Terminating Wire | R | R | | R | | | | | | | R | | |

R = Required C = Conditional O = Optional

LNA Tables for REQ TYP A: Unbundled Network Terminating Wire

The following charts show the Required, Conditional and Optional (R/C/O) fields for the LS form for the valid Line Level Activities (LNAs). Please refer to the **Completing the LS Form** Section for a listing of the valid LNAs for each account level activity.

All unmentioned fields are either invalid, not applicable, prohibited or not supported. When fields are populated which are not supported by BellSouth, these not supported fields will be ignored. Populating any other fields may result in a fatal reject or a clarification of the service request.

Please note the following codes:

- Mandatory entries are indicated by quotation marks ("xxx").
- Optional fields marked with an asterisk (*) force at least one of the conditional fields to become required when populated.
- Fields used only for manual orders are followed by (m).
- Fields used only for electronic orders are followed by (e).

See the **Data Element Dictionary** Section for additional information on each of the fields listed below.

LNA = N

| LNA = N -- <i>Unbundled Network Terminating Wire</i> | | |
|--|-------------|-------------|
| Required | Conditional | Optional |
| PON (m) | VER (m) | REMARKS (m) |
| AN (m) | | |
| LQTY (m) | | |
| PG_OF_ (m) | | |
| LNUM (m) | | |
| LNA = " N " (m) | | |
| ECCKT (m) | | |

" " = mandatory entry; * = when this optional field is populated, it forces at least one of the conditional fields to become REQUIRED; (m) = for manual ordering only; (e) = for electronic ordering only

LNA = D

| LNA = D -- <i>Unbundled Network Terminating Wire</i> | | |
|--|-------------|-------------|
| Required | Conditional | Optional |
| PON (m) | VER (m) | REMARKS (m) |

| | | |
|-----------------|--|--|
| AN (m) | | |
| LQTY (m) | | |
| PG_OF_ (m) | | |
| LNUM (m) | | |
| LNA = " D " (m) | | |
| ECCKT (m) | | |

ATTACHMENT 11

THE HISTORY OF MCI's MOST RECENT ISSUES REFLECT BELL SOUTH'S CONVOLUTED RESPONSES AND RESISTANCE TO SET OR MEET COMMIT DATES

Details on process for updating CSR, migration of TNs and updating switches.

| | |
|----------|---|
| | Questions first asked early last Fall |
| 01/03/02 | BST would not agree to answer this question |
| 01/10/02 | BST took no action. Questions re-asked. No ETA given. |
| 01/17/02 | Examples sent to BST. No ETA given. |
| 01/24/02 | No ETA given by BST. |
| 01/31/02 | BST stated this was going through ERT. No ETA. |
| 02/07/02 | No ETA given. |
| 02/14/02 | No ETA given. |
| 02/21/02 | ETA given of 02/24/02 |
| 02/28/02 | ERT received 02/26/02 |

MCI requested analysis of a sampling of our manual fall out.

| | |
|----------|---|
| 01/10/02 | ETA of two weeks given (01/24/02) |
| 01/17/02 | BST had not worked the issue questioned value. Commit date moved to 01/31/02 |
| 01/24/02 | Pending 01/31/02 commit date. |
| 01/31/02 | BST stated this was going through ERT. Dropped 01/31/02 commit date. |
| 02/07/02 | No ETA given. |
| 02/14/02 | No ETA given. |
| 02/21/02 | ERT received 02/19/02 |
| Present | MCI was unsatisfied with BST's ERT response and has several questions still outstanding |

Meeting to review MCI's manually handled orders and clarifications

| | |
|----------|---|
| 01/31/02 | 02/14/02 commit date |
| 02/07/02 | Pending 02/14/02 commit date. |
| 02/14/02 | 02/14/02 commit date missed. No new date given. |
| 02/21/02 | New commit date of 02/28/02 or later. |
| 02/27/02 | Meeting held. |

BST software change to send complete Line Loss data via NDM

| | |
|----------|---|
| 08//01 | Problem with Line Loss raised |
| 10//01 | BST provides reasons for Line Loss |
| 01/03/02 | BST committed to February. |
| 01/10/02 | Commitment narrowed to 02/02/02. |
| 02/02/02 | Software change made on 02/02/02. |
| 02/28/02 | Additional change made |
| Present | MCI still seeing a discrepancy between web site and NDM data. |

BST to provide pre 10/01/01 line loss data.

| | |
|----------|--|
| | Problem raised last Fall |
| 01/03/02 | BST can not provide the data |
| 01/10/02 | BST can provide the data. Working on format. No ETA. |
| 01/17/02 | BST not sure if they can provide the data. |
| 01/24/02 | BST not sure if they can provide the data. Status by 01/31/02. |

03/28/02

| | |
|----------|---|
| 01/31/02 | BST still not sure if they can provide the data. |
| 02/08/02 | BST can provide data. Process to be presented on 02/21/02 |
| 02/14/02 | Pending 02/21/02 commit date for process. |
| 02/21/02 | Process presented. (Excel file) Data due 05/07/02. |
| 02/28/02 | BST says that the line loss data will be provided 4/15/02 |
| Present | Data remains pending since 8/14/01 |

Questions about BST's Line Loss web site for use prior to 02/02/02 software fix.

| | |
|----------|---|
| 12/28/01 | Questions sent. |
| 01/03/02 | No update given. |
| 01/10/02 | Commitment date of 01/18/02 given. |
| 01/17/02 | BST said they would not make the 01/18/02 date. New commit date to be given on 01/19/02. (Didn't happen) |
| 01/24/02 | BST stated this is going through the ERT process. No ETA. |
| 01/31/02 | No ETA. |
| 02/07/02 | No ETA. <u>Information was only useful for MCI prior to 02/02/02.</u> |
| 02/12/02 | ERT received 02/12/02. |

Fix to ZLIG FID manual fall out

| | |
|----------|--|
| 10/3/01 | MCI was told a fix was coming. |
| 11/29/01 | Requested status. |
| 12/06/02 | No answer. Committed to answer by 12/13/02. |
| 12/13/02 | BST response addressed a fix that was unrelated to MCI's question. |
| 01/03/02 | No ETA for answer or fix. |
| 01/11/02 | BST answered that fix was due in 2002. |
| 01/24/02 | BST retracted previous answer. Now no fix is planned. |
| 01/31/02 | New answer. BST is looking for fix but no ETA. |
| 02/18/02 | ZLIG fix scheduled for 10.5 release on 5/18/02. |
| Present | MCI continues to request documentation proving inclusion in 5/18/02 release without success. |

Rejects/Clarifications for NON TN/SANO related validations following 11/17 fix.

| | |
|----------|---|
| 12/06/02 | MCI provided Account Team with examples and requested LCSC rep training. |
| 01/11/02 | MCI provided additional examples. No change in clarification volume. |
| 01/24/02 | MCI provided a third set of examples. No improvement in volume. |
| 02/07/02 | MCI provide a fourth set of examples. No improvement in volume. |
| 02/14/02 | MCI went around Account Team to Diane Chadwick (LCSC Operations VP). She was unaware of the problem. All previous examples sent to her. |
| 02/28/02 | Dramatic improvement in invalid clarifications from LCSC. |

Incorrect Due Dates on Supped orders.

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| 01/11/02 | MCI provided BST with 20 examples |
| 01/17/02 | During a 1/15/02 call MCI was given data that was determined to be incorrect during the call. |
| 01/24/02 | This issue will be fixed on 04/06/02 in CR0620. Language for CR0620 does not cover ReqType M and all sups. BST to change language of CR0620. |
| 02/08/02 | CR0620 still not changed. Account Team to readdress. This issue was also brought to the attention of Steve Hancock. (CR author) |
| 02/14/02 | Account Team stated that CR had been updated to include all ReqTypes and Sups. (MCI confirmed on the web site that this was incorrect) |

02/27/02 Steve Hancock states in CCP meeting that CR0620 will only include ReqType J Sup 3 as stated in the CR.
02/28/02 Account Team said Steve misspoke and include all ReqTypes and Sups.
03/01/02 CR0620 updated to include all ReqTypes but only Sup 3.
3/20/02 BST said change would not cover Sup 2.
3/28/02 BST states that all supplemental orders fall to manual and that this is the reason that orders were handled incorrectly—